

Exhibit W2

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1

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 EASTERN PROFIT CORPORATION LIMITED,

5 Plaintiff/Counterclaim Defendant,

6 -against- Case No. 18-cv-2185 (JGK)

7 STRATEGIC VISION US, LLC,

8 Defendants/Counterclaim Plaintiff,

9 -against-

10 GUO WENGUI a/k/a MILES KWOK,

11 Counterclaim Defendant.

12 -----X

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14

15 DEPOSITION OF

16 HAN CHUNGUANG

17 New York, New York

18 November 11, 2019

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24 REPORTED BY: TERRI FUDENS

25 FILE NO: AD0B4F6

Han Chunguang
November 11, 2019

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<p>1 2 IN THE UNITED STATES DISTRICT COURT 3 FOR THE SOUTHERN DISTRICT OF NEW YORK 4 -----X 5 EASTERN PROFIT CORPORATION LIMITED, 6 Plaintiff/Counterclaim Defendant, 7 V. Case # 18-cv-2185 (JGK) 8 STRATEGIC VISION US, LLC, 9 Defendants/Counterclaim Plaintiff. 10 V. 11 GUO WENGUI a/k/a MILES KWOK, 12 Counterclaim Defendant. 13 -----X 14 15 Deposition of HAN CHUNGUANG, a Non-Party 16 Witness, taken by the Defendant-Counterclaim 17 Plaintiff pursuant to Court Order held at 620 18 Eighth Avenue, New York, New York, commencing at 19 10:03 A.M., Monday, November 11, 2019, before 20 Terri Fudens, a Stenotype Reporter and Notary 21 Public of the State of New York. 22 23 24 25</p>	<p>1 2 I N D E X 3 WITNESS: EXAMINATION BY: PAGES: 4 Han Chunguang Ms. Donnelly 5 5 6 E X H I B I T S 7 DEFENDANT'S: DESCRIPTION: PAGES: 8 30 Notice of Change of Company 106 9 Secretary and Director 10 (Appointment/Cessation) Bates 11 stamped EASTERN-000400 to 402 12 31 A piece of yellow paper 109 13 containing the witness' name 14 handwritten three times 15 32 A two-page document titled 109 16 Limited Power of Attorney 17 Bates stamped EASTERN-000276 18 and 277 19 33 A document titled Substitution 118 20 of Counsel consisting of two 21 pages 22 34 A document titled Research 119 23 Agreement dated December 29, 24 2017 Bates stamped 25 EASTERN-000005 to 000009 26 35 A document titled Loan 124 27 Agreement Bates stamped 28 EASTERN-000278 to 280 29 36 A black and white photograph 153 30 of five people 31 32 * * * * *</p>
Page 2	Page 4
<p>1 2 A P P E A R A N C E S : 3 PEPPER HAMILTON LLP 4 Attorneys for Plaintiff/Counterclaim 5 Defendant - Eastern Profit Corporation, Ltd. 6 1313 North Market Street 7 Suite 5100 8 Wilmington, Delaware 19801 9 10 BY: CHRIS CHUFF, ESQ. 11 12 GRAVES GARRETT LLC 13 Attorneys for Defendant/Counterclaim 14 Plaintiff - Strategic Vision US LLC 15 1100 Main Street, Suite 2700 16 Kansas City, Missouri 64105 17 816.2563181 18 BY: EDWARD D. GREIM, ESQ. 19 edgreim@gravesgarrett.com 20 21 JENNIFER DONNELLI, ESQ. 22 jdonnelly@gravesgarrett.com 23 24 GOLDEN SPRING (NEW YORK) LTD. 25 In-House Counsel for Golden Spring 1 162 E. 64th Street 2 New York, New York 10065 3 917.941.9698 4 BY: DANIEL PODHASKIE, ESQ. 5 6 ALSO PRESENT: 7 French Wallop 8 Michael Waller 9 Yvette Wang 10 Ann Chi Ho, Interpreter</p>	<p>1 2 HAN CHUNGUANG 3 ANN CHI HO, the Interpreter, was duly sworn by 4 Terri Fudens, a Notary Public of the 5 State of New York, to accurately 6 translate the following questions and 7 answers to the best of her ability. 8 H A N C H U N G U A N G , a Non-Party witness 9 herein, having been first duly sworn 10 by Terri Fudens, a Notary Public of 11 the State of New York, was examined 12 and testified as follows: 13 EXAMINATION BY 14 MS. DONNELLI: 15 Q Please state your name for the 16 record. 17 A Chunguang Han. My last name is Han. 18 My first name is Chunguang. 19 MR. CHUFF: Chris Chuff for 20 Eastern Profit Corporation Limited 21 and the witness. 22 MS. WANG: Yvette Wang from 23 Golden Spring, New York, Ltd. 24 MR. PODHASKIE: Daniel Podhaskie 25 with Golden Spring, New York, Ltd. 26 MS. DONNELLI: Eddie Greim and</p>

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2 (Pages 2 to 5)

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<p>1 HAN CHUNGUANG 2 keep my questions as focused on those 3 topics as I can. But there's come 4 background that I think is necessary 5 to place this witness in the context 6 of those questions. I will try to 7 keep it focused. I do have some 8 background.</p> <p>9 MR. CHUFF: Why is where he was 10 born relevant to the contract claim?</p> <p>11 MS. DONNELLI: Well that's, I 12 think, in part to make the witness 13 sort of comfortable with getting to 14 know me and I'm getting to know him.</p> <p>15 MR. CHUFF: Okay.</p> <p>16 MS. DONNELLI: I will probably 17 have questions about his time here in 18 relation to the documents that he 19 signed. So I want to kind of place 20 his local where he was at certain 21 times.</p> <p>22 MS. WANG: Can you please 23 translate, madam translator.</p> <p>24 MS. CLINE: Thank you.</p> <p>25 Q I believe the question was where were</p>	<p>1 HAN CHUNGUANG 2 this unless the court directs us to 3 do so.</p> <p>4 MS. DONNELLI: We'll withdraw 5 the question.</p> <p>6 MR. CHUFF: Thank you.</p> <p>7 Q When you were living in China, did 8 you begin working for Eastern Profit?</p> <p>9 A Okay. When I was working for this 10 company, it was in 2017. No. No. No. It was in 11 2015 or 2016. That's right.</p> <p>12 Q Were you living in the United States 13 in 2015 or 2016?</p> <p>14 A Not yet. At the time I was in Hong 15 Kong.</p> <p>16 Q When did you begin living in the 17 United States?</p> <p>18 A In 20 -- I'm not sure, but I have 19 been here for several years already.</p> <p>20 Q Were you performing a role for 21 Eastern Profit while you were living in the United 22 States?</p> <p>23 A I am an agent for them.</p> <p>24 Q Were you an agent for Eastern Profit 25 while you have been living in the United States?</p>
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<p>1 HAN CHUNGUANG 2 you born.</p> <p>3 A In China.</p> <p>4 Q Where in China?</p> <p>5 A Shandong. S-H-A-N-D-O-N-G.</p> <p>6 Q What brought you to the United 7 States?</p> <p>8 MR. CHUFF: Objection. I'm not 9 going to allow the witness to testify 10 about this. The court has already 11 ordered that personal history and 12 reasons for coming to the United 13 States is clearly beyond the scope of 14 relevancy to these proceedings. And 15 I'm not going to allow him to answer 16 without the court ordering us to do 17 so.</p> <p>18 I direct you to Docket 189, 19 page 7 where it says personal history 20 and reasons for coming to the United 21 States, defendant has not 22 demonstrated the relevance of this 23 topic.</p> <p>24 So we're not going to allow the 25 witness to answer any questions about</p>	<p>1 HAN CHUNGUANG 2</p> <p>3 A Before June, 2017 I was a director of 4 this company. However, in July that year, I 5 transferred it to -- Guo Mei ask me to be an agent 6 for this company after the transfer.</p> <p>7 Q Before June, 2017, were you living in 8 the United States?</p> <p>9 A I think so.</p> <p>10 Q Have you lived in the United States 11 since June of 2017 and nowhere else?</p> <p>12 A I am not sure, but I think I have 13 been moving around.</p> <p>14 Q Within the United States?</p> <p>15 A Yes.</p> <p>16 Q Have you been back to China since 17 June of 2017 for any extended period?</p> <p>18 MR. CHUFF: Objection to form. 19 Again, I'm going to cut this off 20 soon. It's not relevant to the 21 issues that the court allowed your 22 side to proceed on.</p> <p>23 A No.</p> <p>24 Q Where do you currently live?</p> <p>25 A In United States.</p> <p>Q What city?</p>
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<p>1 HAN CHUNGUANG 2 A New York. 3 Q What street? 4 MR. CHUFF: Objection. 5 Relevance and that's beyond the scope 6 of what the court allowed. 7 MS. DONNELLI: The court didn't 8 make an order about this witness. 9 The court made an order about 10 Mr. Guo. 11 Besides, at the most recent 12 deposition, which was of Eastern 13 Profit, the litigant, we heard 14 testimony that this witness has 15 involvement with Eastern Profit, 16 significant involvement. So I'm 17 exploring where he was located. 18 MR. CHUFF: You have the city. 19 Why do you need the street address? 20 MS. DONNELLI: I routinely ask 21 witnesses what their street address 22 is. 23 MR. CHUFF: I just don't see how 24 it's relevant. 25 MS. DONNELLI: If you're going</p>	<p>1 HAN CHUNGUANG 2 it to you. But the court was very 3 clear that he had limited involvement 4 in issues in this case and has to be 5 focused on the power of attorney, the 6 ACA loan and the Strategic Vision 7 Research Agreement. 8 MS. DONNELLI: And that was an 9 order entered upon a representation 10 by your side of things about what 11 this witness knew. And at our last 12 deposition, which I know you didn't 13 attend -- 14 MR. CHUFF: But I read. 15 MS. DONNELLI: -- but you read, 16 you will agree that there was 17 testimony that this witness had 18 significant involvement with Eastern 19 Profit. 20 MR. CHUFF: I would not agree 21 that there was any testimony that he 22 had significant involvement. Again, 23 I don't think his street address is 24 relevant. 25 MS. DONNELLI: The testimony is</p>
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<p>1 HAN CHUNGUANG 2 to instruct him not to answer, that's 3 one thing. But I caution you that 4 that's a very common question to ask 5 of a witness. 6 MR. CHUFF: We've agreed to 7 produce him at trial already. So you 8 don't need to serve him with 9 anything. It's beyond the scope. 10 MS. DONNELLI: I'm trying to 11 understand the context of where he's 12 doing his work for this entity and to 13 be able to understand where he lives. 14 The time frame in question is 15 important. 16 MR. CHUFF: I agree. And that's 17 why I let you get to New York City, 18 because I understand the relevance of 19 that. But if I don't understand the 20 relevance of the street name, we're 21 not going to allow it unless the 22 court orders us to. 23 And just to correct one thing, 24 there is an oral order about 25 Mr. Han's deposition, and I can read</p>	<p>1 HAN CHUNGUANG 2 he was the boss of Eastern Profit. 3 So anyway, I think it's relevant to 4 understand where this witness resides 5 so that we can see where he is at in 6 relation to entities that have an 7 association with Eastern Profit. 8 MR. CHUFF: Until you've 9 achieved that, I'm not going to allow 10 him to answer about his street 11 address. 12 MS. DONNELLI: You're not going 13 to allow him to answer his street 14 address? 15 MR. CHUFF: Not without the 16 court directing me to do so. 17 MS. DONNELLI: You're going to 18 instruct the witness not to answer. 19 I just want the record to be clear. 20 MR. CHUFF: Yes. 21 Q Since June of 2017, have you been 22 living in the same location? 23 A I don't think I have moved. 24 Q You have been living in the same 25 location here in New York since June of 2017;</p>
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<p>1 HAN CHUNGUANG 2 correct? 3 A I have stayed in New York. 4 MS. DONNELLI: Can you repeat 5 the question to the witness and ask 6 him to answer the question? 7 (Interpret complying) 8 MR. CHUFF: Objection to form. 9 A Yes. 10 Q Do you own the place where you live, 11 or do you rent the place where you live? 12 MR. CHUFF: Objection. Form. 13 A Rent. 14 Q Does anyone live there with you 15 today? 16 MR. CHUFF: Objection. Again, 17 this is way beyond the scope of what 18 the court agreed that this witness 19 could be produced to testify about. 20 So unless the court changes its 21 order by a request from you, I'm not 22 going to allow him to testify about 23 this stuff. 24 MS. DONNELLI: As you know, the 25 court is closed today. We're going</p>	<p>1 HAN CHUNGUANG 2 he knows anything about those 3 allegations. Maybe he knows 4 something that relates to a defense 5 on the claim as opposed to the 6 counterclaim; right? But it's not to 7 go off on just, you know, satisfying 8 Mr. Greim's curiosity about, you 9 know, what he might know about 10 anything and everything in the 11 universe that relates to Mr. Guo or 12 the universe that relates to 13 Mr. Chenguang, or the universe that 14 relates to Miss Wang. 15 This is, you know, the request 16 that I've seen. I'm just going to 17 say it as clear as I can, Mr. Greim, 18 they are overbroad. You've got 19 claims. You have to be able to 20 articulate why something is relevant 21 to a claim. You have -- 22 MS. DONNELLI: Counsel, I 23 recognize you want to make a record, 24 but you're taking up a lot of time to 25 do that. And I think you're</p>
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1 HAN CHUNGUANG
 2 believe this witness has a
 3 relationship with that witness. So I
 4 ask if the witness will answer the
 5 question.

6 MR. CHUFF: I'm instructing him
 7 not to answer. This is not relevant
 8 to any of the issues, and the court
 9 has been very clear that this has to
 10 be a very narrow deposition with his
 11 involvement with the issues in this
 12 case. And this has nothing to do
 13 with the contracts at issue.

14 MS. DONNELLI: You haven't even
 15 let me establish where it might go.
 16 You're just instructing the witness
 17 not to answer.

18 MR. CHUFF: Explain it to me,
 19 because I'm not seeing the relevance.

20 MS. DONNELLI: Because we
 21 believe that that is an address
 22 connected with Guo Wengui, and we
 23 think that this witness has a
 24 relationship with Guo Wengui that is
 25 deeper than perhaps your objections

1 HAN CHUNGUANG
 2 know, what he might know about
 3 anything and everything in the
 4 universe that relates to --

5 MS. DONNELLI: Counsel, you just
 6 read that again for a second time.
 7 You're obstructing this deposition.

8 MR. CHUFF: That's exactly what
 9 you're doing. I'm not wasting my
 10 time.

11 MS. DONNELLI: You read that
 12 twice and I asked you to not obstruct
 13 the deposition. I'm surprised that
 14 you are frankly, but you are.

15 MR. CHUFF: I'm surprised that
 16 after I read it the first time you're
 17 still asking these questions.

18 MS. DONNELLI: Let's just move
 19 on.

20 Q Do you know a Guo Wengui?

21 A Yes.

22 Q How do you know that name?

23 A In 2009 I went to visit Mr. Guo
 24 Wengui not Guo Pangu because of his
 25 representation.

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Page 24

1 HAN CHUNGUANG
 2 are intended to convey.

3 So you're not even letting me
 4 get into anything, and you're
 5 instructing a witness not to answer,
 6 a fact witness not to answer. And
 7 that, I believe, is a dangerous
 8 ground.

9 MR. CHUFF: How is that relevant
 10 whether the contract been breached?

11 MS. DONNELLI: I just explained
 12 it. The context of this witness'
 13 involvement with these contracts with
 14 the people these contracts involved
 15 is important. You're not even
 16 letting me go anywhere.

17 MR. CHUFF: The contracts, I
 18 agree with you. But that's not what
 19 you're asking.

20 MS. DONNELLI: All right.

21 MR. CHUFF: I'll only add one
 22 sentence. This is what the Judge
 23 said: This deposition is not to go
 24 off on just, you know, satisfying
 25 Mr. Greim's curiosity about, you

1 HAN CHUNGUANG
 2 Because of my adoration for him, I
 3 learned investment architecture, art and
 4 everything else from him, Pangu.

5 Q Was Mr. Guo your mentor?

6 A Yes. A mentor.

7 Q What is the nature of your
 8 relationship with Mr. Guo while you've been living
 9 in the United States?

10 A Our relationship after all is about
 11 my learning from him, my learning about investment
 12 and how to do things from him.

13 Q Is it your testimony that you have
 14 never been in the Sherry Netherland building here
 15 in New York City?

16 MR. CHUFF: Objection.

17 Mischaracterizes testimony.

18 A I don't understand your question.

19 Q Have you ever been in the Sherry
 20 Netherland building here in New York City?

21 A Yes.

22 Q For what reason?

23 A Because Mr. Guo was there. I went to
 24 learn from him about -- just about everything.

25 Q Have you lived in the Sherry

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7 (Pages 22 to 25)

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<p>1 HAN CHUNGUANG 2 Netherlands location with Mr. Guo? 3 MR. PODHASKIE: Objection to 4 form. 5 A No. 6 Q Has Mr. Guo ever employed you? 7 A Did Mr. Guo employ me? What do you 8 mean by that? 9 Q Have you performed any jobs for 10 Mr. Guo for which you have been paid? 11 A No. 12 Q Have you received any form of 13 compensation from Mr. Guo? 14 A No. 15 Q Over the last year, how often have 16 you seen Mr. Guo, meaning every day, once a month? 17 MR. CHUFF: Okay. Objection. 18 Apparently I have to read the 19 transcript the third time. This is 20 exactly what the court said you may 21 not delve into. I'm not allowing the 22 witness to answer it. 23 Q Under what context have you seen 24 Mr. Guo over the last year? 25 MR. CHUFF: Unless it's related</p>	<p>1 HAN CHUNGUANG 2 then ask more specific questions. 3 Are you still instructing this 4 witness, a fact witness, not to 5 answer? 6 MR. CHUFF: Can you repeat the 7 question? 8 (The requested portion of the 9 record was read back by the 10 reporter.) 11 MR. CHUFF: I withdraw the 12 instruction not to answer that 13 question. 14 (The requested portion of the 15 record was read back by the 16 reporter.) 17 A I don't think this question has 18 anything to do with this case; right? 19 Q The counsel today for you has 20 instructed you to answer. 21 MR. CHUFF: I withdrew my 22 instruction not to answer. 23 A I have followed Mr. Guo for a long 24 time. 25 Q For what purpose?</p>
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<p>1 HAN CHUNGUANG 2 MR. CHUFF: I'm sorry. 3 Objection. What Mr. Han is learning 4 from Mr. Guo has nothing to do with 5 any of the issues. 6 MS. DONNELLI: Why don't you 7 make an objection for the record. 8 MR. CHUFF: I'm explaining why 9 I'm instructing him not to answer 10 these questions. 11 MS. DONNELLI: All right. Why 12 don't you just instruct him not to 13 answer, because this whole process is 14 obstructing this deposition. So why 15 don't you instruct him not to answer. 16 There's no need to go further than 17 that. We'll take it up with the 18 judge. 19 MR. CHUFF: It's beyond the 20 scope of what the court ordered. 21 MS. DONNELLI: This whole 22 process is obstructing this 23 deposition. 24 So why don't you instruct him 25 not to answer. There's no need to go</p>	<p>1 HAN CHUNGUANG 2 You're instructing this witness 3 not to answer a question about this 4 witness' testimony to a question. 5 You allowed him to answer. 6 MR. CHUFF: I'm not allowing 7 you to explore his relationship with 8 Mr. Guo that has nothing to do 9 with -- 10 MS. DONNELLI: It is a yes or no 11 question I've asked you. 12 MR. CHUFF: Okay. I'm going to 13 give you my answer. I'm instructing 14 the witness not to answer a question 15 that is beyond what the court ordered 16 him to appear for. And it's not 17 related to Eastern Profit or the 18 contracts at issue in this case. His 19 relationship with Mr. Guo, outside of 20 this case, has nothing to do with 21 anything. 22 MS. DONNELLI: Well, counsel, 23 your witness here has already 24 testified that he had a role with 25 Eastern Profit, and I'm entitled to</p>
<p style="text-align: center;">Page 30</p> <p>1 HAN CHUNGUANG 2 further than that. We'll take it up 3 with the judge. 4 MR. CHUFF: I instruct him not 5 to answer. 6 Q Do you pay Mr. Guo to teach you about 7 investment? 8 MR. CHUFF: Objection. 9 Relevance. Beyond the scope of the 10 order. I instruct him not to answer. 11 MS. DONNELLI: So you're going 12 to instruct the witness not to answer 13 a question that follows up on the 14 very words the witness used to a 15 question you allowed. I want to be 16 sure I understand your position. 17 The witness testified to this 18 information. I'm asking him about 19 it. 20 MR. CHUFF: I tried to give you 21 some leeway, but this is completely 22 irrelevant and contrary to what the 23 court ordered about the deposition. 24 MS. DONNELLI: I want to make 25 sure I understand.</p>	<p style="text-align: center;">Page 32</p> <p>1 HAN CHUNGUANG 2 understand if investment was relating 3 to that. 4 MR. CHUFF: You asked him about 5 his mentorship relationship with 6 Mr. Guo. He said he's learning 7 investments. You're asking about 8 what investments. 9 MS. DONNELLI: There's nothing 10 improper about that. 11 MR. CHUFF: You're not asking 12 Eastern Proffit's investments. 13 You're asking about what he's 14 learning from Mr. Guo. That's 15 completely improper and it's a 16 fishing expedition beyond the scope 17 of what the court ordered. 18 Q Do the investment matters that 19 Mr. Guo teaches you about involve Eastern Profit? 20 A No. 21 Q You testified that Mr. Guo teaches 22 you how to do things. Do those things involve 23 Eastern Profit? 24 A No. What Mr. Guo taught me was to 25 give me a direction. He didn't teach me anything</p>

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9 (Pages 30 to 33)

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<p>1 HAN CHUNGUANG 2 specific. 3 Q Have you ever discussed Eastern 4 Profit with Mr. Guo? 5 A No. 6 Q Does the address 162 East 64th 7 Street, New York City mean anything to you? 8 A I have heard about it. 9 Q What do you understand it to be? 10 A I was in the lobby of this building 11 to meet Yvette and discussed about paying back a 12 loan. 13 Q A loan to whom? 14 A I borrowed money from William, and 15 William was asking me to pay him back. That was 16 the matter I brought it up with Yvette in the 17 lobby of this building. 18 Q Did you or Eastern Profit borrow the 19 money you're referring to? 20 A The company did. 21 Q How often do you meet with Mr. Guo 22 for him to mentor you and teach you how to do 23 things? 24 MR. CHUFF: Objection. For the 25 reasons I've already discussed, I</p>	<p>1 HAN CHUNGUANG 2 A The business is a family trust. 3 Therefore, I would say I've been working for it 4 for a long time. 5 Q Since you've been in the United 6 States? 7 A Yes. 8 Q Does it have any involvement with 9 Eastern Profit? 10 A No. 11 Q Is the name of the company Golden 12 Spring New York Limited? 13 A I don't understand your question. 14 Can you rephrase your question? 15 Q Does a company called Golden Spring 16 New York employ you? 17 A No. 18 Q Has that company ever employed you? 19 A No. But again, I'm not sure. My 20 recollection is not clear. 21 Q Has a company called Golden Spring 22 Hong Kong Limited ever employed you? 23 A No. 24 Q If I represented to you that Golden 25 Spring New York Limited employed Yvette Wang,</p>
<p style="text-align: center;">Page 34</p>	<p style="text-align: center;">Page 34</p>

<p>1 HAN CHUNGUANG 2 instruct the witness not to answer 3 unless counsel can direct it to some 4 kind of relevance to Eastern Profit. 5 Q Do you know who Guo Mei is? 6 A Yes. 7 Q Is Guo Mei Mr. Guo's daughter? 8 A Yes. 9 Q Does Guo Mei have a relationship with 10 Eastern Profit? 11 A Guo Mei is a director of Eastern 12 Profit right now. 13 Q Have you ever discussed Guo Mei's 14 role with Eastern Profit with Mr. Guo? 15 A No. I have never had such a 16 discussion with Mr. Guo. 17 Q Do you have a job at this time? 18 A Do I have a job right now? Yes. 19 Q Where are you employed? 20 A I work for my own company. 21 Q What is your company called? 22 A Since this has nothing to do with 23 this case, I'm not going to answer this question. 24 Q How long have you been employed by 25 your company?</p>	<p>1 HAN CHUNGUANG 2 would that refresh your recollection whether it 3 has employed you? 4 A I did ask Yvette to do something for 5 me. And she is or was involved with Golden Spring 6 New York. 7 THE INTERPRETER: Interpreter 8 note in Chinese we don't have a 9 tense. In China no present, or past, 10 or future things. 11 Q When you met with Yvette Wang to 12 discuss a loan, was she there personally or for 13 Golden Spring New York? 14 A She represented the company. 15 Q Golden Spring New York? 16 A Yes. 17 Q Why would you be speaking with Golden 18 Spring New York about a loan? 19 A It is not like I was speaking to 20 Golden Spring New York. I was speaking 21 specifically to Yvette as far as what capacity 22 Yvette represented, it had nothing to do with me. 23 Q Do you know who Yvette represented 24 during that meeting? 25 A Which meeting again?</p>
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10 (Pages 34 to 37)

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1 HAN CHUNGUANG
 2 Q You testified about meeting Yvette
 3 Wang in the lobby to discuss a loan.
 4 A What's your question? I won't
 5 qualify the discussion as a meeting. I chatted
 6 with her briefly.
 7 Q When you say briefly, how long was
 8 it?
 9 A Around 20 minutes at the most. 20
 10 some minutes.
 11 Q Was anyone else present besides you
 12 and Yvette?
 13 A No.
 14 Q How did you know to meet with Yvette?
 15 A I don't understand her question.
 16 What do you mean how did I know to meet with
 17 Yvette?
 18 Q Why did you meet with Yvette rather
 19 than Mr. Guo?
 20 A That day I went there to see Mr. Guo
 21 who stayed there at the time. I bumped into
 22 Yvette in the lobby. I brought up the subject
 23 that William was asking me to pay back a loan, and
 24 I chatted with her briefly.
 25 Q Why did you think that Yvette knew

1 HAN CHUNGUANG
 2 MS. WANG: She just called me a
 3 bitch just now. She said that. I
 4 want it on the record. I'm sorry.
 5 MR. PODHASKIE: I didn't hear.
 6 MR. GREIM: Let's stop and get
 7 an answer to this question.
 8 A At the time when I hired an
 9 investigation company, and Yvette told me I needed
 10 money to hire the company, that was why I borrowed
 11 from William.
 12 When William ask me to return the
 13 money, I had to bring it up with Yvette because
 14 Yvette was telling me somehow we got misled. And
 15 I wanted her to know results of investigation we
 16 received. I have to know. I have to tell Yvette
 17 about it.
 18 Q I have one more question, and then we
 19 can take a restroom break. You have been
 20 referring to William. What is William's full
 21 name?
 22 A William.
 23 Q Can you please spell that?
 24 A YU. I think Y-U.
 25 Q Is William Yu the same person as

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1 HAN CHUNGUANG
 2 anything about the loan?
 3 A I don't understand your question.
 4 What do you mean?
 5 Q You met with Yvette to discuss the
 6 loan because you believed she knew about the loan;
 7 correct?
 8 A I hired a company to investigate a
 9 matter for me, and I asked Yvette to handle it for
 10 me. At the time I borrowed money from William to
 11 hire this investigation company. However, the
 12 investigation didn't go anywhere.
 13 William was asking me to pay back the
 14 loan. When I bumped into Yvette, I have to tell
 15 Yvette what was going on.
 16 Q Why did you choose Yvette to tell
 17 this to?
 18 A By the way, can I go to the bathroom
 19 first.
 20 Q In a few minutes we will take a
 21 break, but please answer the question.
 22 A Can you repeat your question?
 23 (The requested portion of the
 24 record was read back by the
 25 reporter.)

1 HAN CHUNGUANG
 2 William Je, J-E?
 3 A I have no idea.
 4 Q When you've been using the name
 5 William today since we've been talking, have you
 6 always been referring to William Yu?
 7 A Yes. Yes, I think so.
 8 MS. DONNELLI: Thank you. You
 9 requested a bathroom break. I would
 10 like to break for no more than 10
 11 minutes.
 12 (At this time, a brief recess
 13 was taken.)
 14 CONTINUED EXAMINATION
 15 BY MS. DONNELLI:
 16 Q We are here after taking a break.
 17 Is Golden Spring New York's business
 18 office located at 162 East 64th Street?
 19 A I don't know.
 20 Q Why were you able to meet Yvette Wong
 21 in that building if that's not where Golden Spring
 22 New York does its business?
 23 A I don't understand your question.
 24 Q You testified that you bumped into
 25 Yvette in that building, and I'm asking what

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11 (Pages 38 to 41)

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<p>1 HAN CHUNGUANG 2 caused her to be in that building. 3 A I don't know. You have to ask her. 4 It happened that I bumped into her that day, and I 5 talked to her about this matter. That was it. 6 You have to ask her why. 7 Q Where is your place of work located? 8 A My place of work? 9 Q Yes. 10 A I'm not at liberty to disclose that here. 12 Q Is your place of work 162 East 64th Street? 14 A No. 15 Q Why are you not at liberty to disclose your place of work? 17 MR. CHUFF: Objection. Form. 18 A What I'm concerned is that once my information is revealed, the communist party will also learn about it too. 21 Q Is your place of work the same place of work of the family trust? 23 A Your question is rather vague. I don't know how to answer your question. 25 MS. DONNELLI: Can you read the </p>	<p>1 HAN CHUNGUANG 2 Eastern Profit? 3 A Yes. I got permission from Guo Mei, 4 and I authorized Yvette to handle this particular 5 matter for me, which was a matter of hiring and 6 investigation company. 7 Q Is that the only involvement that Yvette had with Eastern Profit? 9 A I'm so sorry. Can you repeat your question. 11 (The requested portion of the record was read back by the reporter.) 14 A In terms of all matters related to the investigation company, I gave my authorization to Yvette so that she could act on my behalf. 17 Q Did Yvette do anything for Eastern Profit other than related to the investigation company? 20 A No. No, because this company of mine was frozen in Hong Kong and that was all I asked her to do for me. 23 Q Going back to this meeting that you had with Yvette at 162 East 64th Street, when did it occur? </p>
<p style="text-align: center;">Page 42</p>	<p style="text-align: center;">Page 44</p>

<p>1 HAN CHUNGUANG question back. 3 (The requested portion of the record was read back by the reporter.) 6 A In terms of her question, I don't know how to answer it. 8 Q When you performed things for Eastern Profit, did you do that at 162 East 64th Street? 10 A No. 11 Q Where were you located when you performed the things you did for Eastern Profit? 13 A The headquarter of this company was in Hong Kong. However, I could choose anywhere I wanted to work for this company. I was quite free. 17 Q Where did you choose to do your work for Eastern Profit? 19 A When I took over this company, I was in Hong Kong. 21 Q Did you perform any work for Eastern Profit anywhere other than Hong Kong? 23 A In New York, I asked Yvette to do thing for me on behalf of this company. 25 Q When you say "this company," you mean </p>	<p>1 HAN CHUNGUANG 2 Several months ago, I think. 3 Q In the year 2019? 4 A Yes. 5 Q Other than that meeting, did you ever speak with or communicate with Yvette about the loan? 8 A I don't remember. 9 Q The work that you currently do for the family trust, is that the type of work you did for Eastern Profit? 12 A Again, since your question is related to what my family trust is doing, I am not at liberty to answer your question here. 15 Q Why not? 16 A Again, I'm concerned about my safety. If I reveal too much information about myself, the communist party eventually will also learn about it too. 20 Q You called this your, Y-O-U-R, family trust. Is it the Han Family Trust that you work for? 23 A My answer will be the same as what I have given to you, to your previous answer -- to your previous question. </p>
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12 (Pages 42 to 45)

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<p>1 HAN CHUNGUANG 2 Q You testified that you had to get 3 permission from Guo Mei to authorize Yvette to do 4 things for Eastern Profit. 5 MR. CHUFF: Objection to form. 6 Q Why did Guo Mei not simply go 7 directly to Yvette rather than through you? 8 A Guo Mei was very busy. Guo Mei gave 9 me the authorization to handle things for her, and 10 then I give the authorization to Yvette to do 11 things for me. It was very logic. This was the 12 way I did my business. 13 Q Was any of the instruction that 14 Mr. Guo gave you about investments helpful to you 15 in your role with Eastern Profit? 16 MR. CHUFF: Objection. Form. 17 A Yes. He has been teaching me a lot. 18 He has given me knowledge. And whatever I learn 19 from him I'll apply it to the rest of my life to 20 apply it to my company, to apply it to my business 21 model. 22 Q Why did you not apply it to Eastern 23 Profit and instead got Yvette involved? 24 MR. PODHASKIE: Objection to 25 form.</p>	<p>1 HAN CHUNGUANG 2 A I think she was in New York, but I'm 3 not sure. Basically I had a phone conversation 4 with her, or I had phone conversations with her. 5 I was not sure where she was. 6 THE INTERPRETER: Interpreter 7 note in Chinese we don't have a 8 singular or plurals. Therefore the 9 interpreter does not know how many 10 phone conversation had with Miss Guo. 11 Q When were the phone conversations? 12 A In 2017. Also in 2018. There were 13 phone conversations in recent years. 14 Q Can you be more specific as far as 15 even a month in those years? 16 A Again, I don't remember the 17 specifics. But I do remember in last few years I 18 spoke with her over the phone. 19 Q Were you working for the family trust 20 when you spoke with Guo Mei about this? 21 A Yes. Continually. 22 Q Why did you not choose someone from 23 the family trust to help you rather than choosing 24 Yvette? 25 A This was due to a business</p>
<p style="text-align: center;">Page 46</p> <p>1 HAN CHUNGUANG 2 A Firstly, my English is not great. I 3 need someone in New York to help me. Therefore, I 4 authorize Yvette to handle things for me. It was 5 as simple as that. 6 Q When you say handle, I understood you 7 to mean that Yvette had your full authority. Do 8 you mean something less than that? 9 A I got full authorization to Yvette to 10 handle the matters was this liar company. 11 Q You testified that Guo Mei authorized 12 you. Was that authorization in writing? 13 A What do you mean, written 14 authorization? 15 Q Yes. 16 A No. Orally. 17 Q Where was Guo Mei located when she 18 gave you the permission to authorize Yvette to 19 undertake things that we've discussed? 20 MR. CHUFF: Objection. Form. 21 THE INTERPRETER: The 22 interpreter needs clarification from 23 the witness to repeat last sentence 24 because the interpreter did not hear 25 it clearly.</p>	<p style="text-align: center;">Page 48</p> <p>1 HAN CHUNGUANG 2 consideration. 3 Q Which was what? 4 A This is rather personal. I don't 5 think I should tell you my business' strategies 6 was. I don't think I want to review it here. 7 Q Did you have personal interests in 8 Eastern Profit? 9 MR. CHUFF: Objection. Form. 10 A When you say personal interest, what 11 do you mean by that? 12 Q I was trying to understand your 13 answer, why something on a personal level affected 14 your decision for Eastern Profit. 15 A I still don't understand your 16 question. What do you mean that my personal way 17 of thinking affected my involvement with the 18 company? 19 Q We will get to that more later. 20 Does the address 800 Fifth Avenue, 21 Suite 21F mean anything to you? 22 A No. 23 Q We've been speaking about an entity 24 called Eastern Profit; true? 25 A Yes.</p>

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13 (Pages 46 to 49)

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<p>1 HAN CHUNGUANG 2 Q What is the full name of that entity? 3 A Eastern Profit. 4 Q Do you know that entity to have any 5 other names? 6 A I'm not sure. 7 Q Your understanding is that the 8 entity's name is Eastern Profit; correct? 9 A Yes. 10 Q No other words in its name; correct? 11 A No. 12 Q When was Eastern Profit formed? 13 A I acquired it somewhere around the 14 end of 2014. I purchased it for someone, but I 15 didn't know whether the company had another name 16 or not before my purchase of it. 17 Q When was your purchase of Eastern 18 Profit? 19 A I think the end of 2014. 20 Q Had you had any involvement with 21 Eastern Profit prior to the end of 2014? 22 A No. 23 Q Who did you acquire it from? 24 A From a friend of mine. 25 Q What was the name of the friend?</p>	<p>1 HAN CHUNGUANG 2 did everything in a legal sense? 3 MR. CHUFF: Objection. Form. 4 A Yes. When I purchased this company 5 for my friend, I was going to use it to do 6 investment business. Of course I wanted to do it 7 right. I wanted to do it legally. I wanted to do 8 it in sound business. 9 Q What review or research did you do 10 before purchasing Eastern Profit to assure 11 yourself that it had, in fact, done things 12 legally? 13 A I was to acquire this company. I did 14 some analysis and performance evaluation. I did 15 it also based upon my experience. By the way, it 16 was a company legally listed. Why would it not do 17 things legally? 18 Q Did Mr. Guo provide you guidance or 19 advice when you were reviewing Eastern Profit to 20 purchase it? 21 A No, not anything specific. 22 Q Did you inform Mr. Guo that you were 23 intending to purchase Eastern Profit before you 24 purchased it? 25 A No.</p>
<p style="text-align: center;">Page 50</p> <p>1 HAN CHUNGUANG 2 A The last name Xu, X-U. Z-H-A-O, 3 H-U-I, X-U. 4 THE INTERPRETER: The 5 interpreter is spelling, which may 6 not be the official spelling. 7 MS. DONNELLI: Thank you. 8 Q Why did you purchase Eastern Profit? 9 A At the time I had just got to Hong 10 Kong. I wanted to open the international market. 11 Therefore, I acquired this company. I wanted to 12 use this company to do some investments. 13 Q Investments in what industry? 14 A Everything, as long as they were 15 legal and could be profitable. 16 Q Why did you choose to purchase 17 Eastern Profit rather than another company? 18 A Because I knew this friend of mine. 19 I knew about him and I kind of knew his business. 20 And this company was just a regular 21 company who did everything legally right. But the 22 decision was based upon logic and no more business 23 consideration. 24 Q What research did you do, if any, 25 before purchasing Eastern Profit to know that it</p>	<p>1 HAN CHUNGUANG 2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your 6 analysis and evaluation, did you review any 7 written materials from Eastern Profit? 8 A At the time in Hong Kong I had an 9 agent. I had this agent of mine to do all the 10 things for me. 11 Q What was the name of the agent? 12 A Natasha. 13 THE INTERPRETER: Interpreter 14 note interpreter earlier 15 misinterpreted the person's gender. 16 Obviously right now we know the 17 gender is a woman. The reason it's 18 not in Chinese, we don't have a 19 gender. 20 Q What was Natasha's last name? 21 A Natasha's last name is Q-U, which may 22 not be the official last name. I don't know how 23 to spell it. I only know she called herself 24 Natasha. It's an English name, Natasha. 25 Q What was Natasha's Chinese name?</p>

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14 (Pages 50 to 53)

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<p>1 HAN CHUNGUANG 2 A I don't know. 3 Q Who did Natasha work for? 4 A What do you mean by that? 5 Q Natasha performed a service for you. 6 Who did she work for? 7 A I didn't know what company she was 8 working for. However, I knew him. I trusted him. 9 In Hong Kong I gave her the authorization to 10 handle my stuff for me in Hong Kong. 11 Q Did she report to you about her 12 review of Eastern Profit before you purchased it? 13 A I think so. But to tell you the 14 truth, I don't remember because it was a long time 15 ago. I would say that I trusted her. In Chinese, 16 trust is everything. 17 Since I trusted her, I gave her full 18 authorization to handle matters for me in Hong 19 Kong. 20 Q Did you put that authorization in 21 writing? 22 A Yes. 23 Q What had Natasha done to earn your 24 trust? 25 A I met her. Also I met her in social</p>	<p>1 HAN CHUNGUANG 2 talk about that. 3 Q We'll talk about that later. 4 How much did you pay for Eastern 5 Profit? 6 A 1,000 Hong Kong currency. 1,000 HK 7 currency. 8 Q Was that worth around 200 U.S. 9 dollars? 10 A I don't know about exchange rate back 11 then. This number is what I can remember right 12 now. All the details about the purchase of the 13 company was handled by Natasha. I didn't know 14 most of the details. 15 Q What was Eastern Profit's 16 capitalization? 17 MR. CHUFF: Objection. The 18 court has already said that the 19 financial identity of Eastern Profit 20 is off limits. Docket entry 189, 21 page 4. To the extent the defendant 22 seeks to further -- inquire further 23 regarding plaintiff's financial 24 situation is a request for a leave to 25 do so. Denied again for failure to</p>
<p style="text-align: center;">Page 54</p> <p>1 HAN CHUNGUANG 2 settings. From what I learned about her, I felt 3 that she was someone that I could trust. 4 Q You testified that you purchased 5 Eastern Profit to make investments. Once you 6 purchased Eastern Profit, did it make any 7 investments? 8 A Yes, some. 9 Q What were they? 10 A I'm not at the liberty to reveal the 11 information here since that question is related to 12 my business secret. 13 Q Can you describe your business secret 14 without revealing it? 15 A Stocks. 16 Q The investment was in stocks? 17 MR. CHUFF: Objection to the 18 form. 19 A No. I invested in stocks. 20 Q Did you invest Eastern Profit 21 resources in stock? 22 A Yes. 23 Q Isn't that public information? 24 MR. CHUFF: Objection. Form. 25 A Yes. However, here I don't want to</p>	<p>1 HAN CHUNGUANG 2 establish relevance. 3 Q Do you know the answer to my 4 question? 5 A I don't understand to answer the 6 question. 7 Q You don't want to say whether you 8 know the answer? 9 A I just trying to tell you that I 10 don't want to answer it. I don't want to answer 11 any question related to this. 12 Q Describe what a capitalization is for 13 a business like Eastern Profit. 14 MR. PODHASKIE: Objection. 15 Vague. 16 A It's difficult for me to say. 17 Q Where was Eastern Profit formed? 18 A In Hong Kong. 19 Q Does Eastern Profit have a business 20 address? 21 A Yes. 22 Q What is it? 23 A Bank of China's building, 49th floor. 24 THE INTERPRETER: Interpreter is 25 translation, which may not be the</p>

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15 (Pages 54 to 57)

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1 HAN CHUNGUANG
 2 official address.
 3 Q Has that always been Eastern Profit's
 4 business address?
 5 MR. CHUFF: Objection.
 6 Foundation.
 7 A When you say that had this address
 8 been the business address of Eastern Profit, what
 9 do you mean by that?
 10 Q I understood you testified that
 11 Eastern Profit had a business location. Is that
 12 true?
 13 A Yes.
 14 Q Where is Eastern Profit's business
 15 location?
 16 A You asking me the company address;
 17 right? The company address was Bank of China
 18 Building, 49th floor.
 19 Q Was that always Eastern Profit's
 20 address since you purchased it?
 21 A Yes.
 22 Q Have you been there?
 23 A Yes, I did.
 24 Q When was that?
 25 A Wow. It was several years ago.

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1 HAN CHUNGUANG
 2 did not need anyone to select it for me.
 3 Q Did you sign any written document to
 4 make yourself director of Eastern Profit?
 5 A Yes.
 6 Q Did you become a director of Eastern
 7 Profit at the same time you purchased it?
 8 A Yes.
 9 Q What was the business of Eastern
 10 Profit when you purchased it?
 11 A Investment.
 12 Q Did that purchase change over time?
 13 A No. No. It had not.
 14 Q Was the amount that Eastern Profit
 15 invested the amount that you used to purchase
 16 Eastern Profit in the first instance?
 17 Where did the fund come from that
 18 Eastern Profit used to make an investment?
 19 A For my family fund.
 20 Q Is that the family fund you work for
 21 today?
 22 A Yes.
 23 Q Who at the family fund did you work
 24 with to get the funds transferred so that Eastern
 25 Profit could make investments?

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1 HAN CHUNGUANG
 2 Q How many times have you been to
 3 Eastern Profit's office?
 4 A Several times.
 5 Q When you purchased Eastern Profit,
 6 did it have any other owners?
 7 A No. I was the only owner at the
 8 time.
 9 Q Describe your role with Eastern
 10 Profit other than that you owned it for a period
 11 of time?
 12 MR. PODHASKIE: Objection.
 13 Form.
 14 A Before I transferred the ownership to
 15 Guo Mei, I was a director of the company. After I
 16 had it transferred to Guo Mei, she was the
 17 director. I became her agent.
 18 Q Is it true that you chose yourself to
 19 be the director of Eastern Profit?
 20 A When you say I choose myself to be
 21 director, I mean I don't really understand your
 22 question, by the way.
 23 Q Did someone select you to be a
 24 director of Eastern Profit?
 25 A I purchased it. I was the boss. I

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1 HAN CHUNGUANG
 2 MR. CHUFF: Objection to form.
 3 A This has nothing to do with this
 4 case, and this question, it's very proven to my
 5 privacy. I don't want to answer it.
 6 Q To put it in a timeframe, you became
 7 a director of Eastern Profit in 2014?
 8 MR. CHUFF: Objection to form.
 9 A That's correct. When I purchased it
 10 in 2014.
 11 Q What educational experience did you
 12 have at that time to prepare you for the role of a
 13 director of Eastern Profit?
 14 MR. CHUFF: Objection to form.
 15 A Is she asking me about my educational
 16 background?
 17 Q Yes, but specifically to give you the
 18 preparation that you needed to be a director of
 19 Eastern Profit.
 20 A I went to two-year college.
 21 Secondly, Mr. Guo has been teaching me a lot.
 22 MS. WANG: That was at least
 23 three years, college.
 24 THE INTERPRETER: It's three
 25 years in China. The interpreter

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16 (Pages 58 to 61)

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<p>1 HAN CHUNGUANG 2 would accept the correction. 3 A I formed a three year college. 4 Secondly, Mr. Guo has been teaching me a lot. 5 Thirdly, I love to read books. Have educated me a 6 lot. Fourthly, society was also a good teacher 7 that taught me a lot. 8 Q What educational institution gave you 9 the degree after the three years of college? 10 A It was Chinese school. 11 Q What was the name? 12 A This question is very specific. I 13 don't think I want to answer such a specific 14 question. 15 Q It is a very common question to be 16 asked where you received a degree from, so please 17 answer the question. 18 A For me this question very specific. 19 This is a very private -- no, I don't mean very 20 private. I just think this question has nothing 21 to do with this case. I don't feel that I should 22 answer this question. 23 Q Are you concerned about answering the 24 question because you did not receive a degree from 25 the Chinese school?</p>	<p>1 HAN CHUNGUANG 2 Q Was it the athletic school of Lunan? 3 A I'm not familiar with the name you 4 pronounced. Lunan? I'm not family with it, is 5 the way you read it. 6 Q Did you receive a degree in athletics 7 from your education? 8 A Yes. I went to an athletic school. 9 Q Is that where you received your 10 degree from? 11 A In terms of a degree, I always got 12 certificate from each level of school. I attended 13 an elementary, from junior high to high school, 14 and from technical secondary school. 15 Q The secondary school was the same 16 thing as the technical school; correct? 17 A I'm not sure. But in Chinese it is 18 called technical secondary school. 19 Q The degree you received from the 20 technical secondary school was in athletics; 21 correct? 22 A Yes. Yes. That's why. 23 Q Have you received any other degrees 24 after high school? 25 MR. CHUFF: Objection. Form.</p>
<p style="text-align: center;">Page 62</p> <p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection. 3 A I did. I went to the school. 4 THE INTERPRETER: Interpreter 5 would like to correct herself. 6 According to the dictionary, the 7 three year college actually was more 8 like technical secondary school. 9 Q Did you receive a degree from a 10 technical school? 11 A Yes. 12 Q What was the name of the technical 13 school? 14 MR. CHUFF: Objection. Form. 15 A It was a long time ago. I don't 16 remember. 17 Q How old are you? 18 A I'm 30 years old. 19 Q You can't remember the name of the 20 school that gave you a degree? 21 MR. CHUFF: Objection. 22 Argumentative. 23 A I don't remember. I don't usually 24 remember small things like this because I'm always 25 very business.</p>	<p>1 HAN CHUNGUANG 2 A I went to some institutions or 3 institution to receive training or trainings. 4 Q In what? 5 A I would say I learned it by myself. 6 For instance, about investment et cetera, et 7 cetera. 8 Q Did you go to a military or state 9 security school in China? 10 A No. 11 Q What about in Hong Kong? 12 A No. 13 Q I want to make sure I understand your 14 answer to my question about what educational 15 experience you had to prepare you to be a director 16 of Eastern Profit. You've described your formal 17 education. 18 What else prepared you to be a 19 director of Eastern Profit? 20 MR. CHUFF: Objection. Asked 21 and answered. 22 A Does she mean that only a person who 23 receives a formal education to be a director can 24 be a director in a company? Is that what she 25 means when she asks this question?</p>

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17 (Pages 62 to 65)

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1 HAN CHUNGUANG
 2 Q That is not the question.
 3 The question is what, besides the
 4 education you described, prepared you to be a
 5 director of Eastern Profit?
 6 A I purchased it and I became the
 7 director of the company.
 8 Q So nothing other than the education
 9 you described prepared you to be a director of
 10 Eastern Profit?
 11 MR. CHUFF: Objection. Asked
 12 and answered. Mischaracterizes the
 13 testimony.
 14 A Let me put it this way. My own
 15 experience, Mr. Guo's teaching, myself learning
 16 and what I have been learning from my family trust
 17 or family fund, all this prepared me for it and
 18 also prepared me for the future. It doesn't mean
 19 that I only learned things through a formal
 20 education.
 21 Q Did you review any written materials
 22 about Eastern Profit when you became its director?
 23 MR. CHUFF: Objection to form.
 24 A I don't remember. In terms of all
 25 the documents related to the company, they were

1 HAN CHUNGUANG
 2 Hong Kong.
 3 Q Regarding Eastern Profit; correct?
 4 A Yes.
 5 Q Were you living in Hong Kong at the
 6 time?
 7 A Yes. When I purchased Eastern
 8 Profit, I lived in Hong Kong.
 9 Q What education did Natasha have that
 10 allowed her to serve this role?
 11 MR. CHUFF: Objection. This is
 12 completely beyond the scope. I let
 13 this go long enough. He's not --
 14 MS. DONNELLI: Are you
 15 testifying for the witness?
 16 MR. CHUFF: I'm explaining why
 17 this line of questioning has to stop.
 18 MS. DONNELLI: Why don't you
 19 just object to it rather than coach
 20 him?
 21 MR. CHUFF: I want to explain my
 22 basis. I'm not coaching him because
 23 he's not going to answer it.
 24 This is not a case where he's
 25 being sued for managing Eastern

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1 HAN CHUNGUANG
 2 handled by Natasha, whom I trusted very much.
 3 Q When Natasha was doing this role,
 4 where was she employed?
 5 MR. CHUFF: Objection. Asked
 6 and answered.
 7 A I don't know whom she was working for
 8 at the time.
 9 Q Was she employed by Eastern Profit?
 10 A She was an agent authorized by me.
 11 Q An agent authorized for Eastern
 12 Profit?
 13 A No. She was the agent authorized by
 14 me. At the time I was the boss of Eastern Profit,
 15 I authorized Natasha to handle a lot of stuff in
 16 Hong Kong for me.
 17 Q Was she an employee of Eastern
 18 Profit?
 19 MR. CHUFF: Objection. Asked
 20 and answered.
 21 A An employee? You can say that.
 22 Q How long was she employed by Eastern
 23 Profit?
 24 A I think about two years. I'm only
 25 talking about she was handling matters for me in

1 HAN CHUNGUANG
 2 Profit a certain way. This is about
 3 a contract between an entity and
 4 another entity.
 5 MS. DONNELLI: Why don't you
 6 just say I'm going to instruct him
 7 not to answer. It will save a lot of
 8 time, and it won't coach the witness.
 9 MR. CHUFF: He's not answering.
 10 Q Is Natasha's name spelled Q-U, first
 11 name, last name G-U. Last name is Q-U. First
 12 name G-U-O-J-I-A-O?
 13 A I don't know this name. I only know
 14 the person I knew whose name was Natasha.
 15 Q Have you personally seen the written
 16 records of Eastern Profit's business dealings?
 17 MR. CHUFF: Objection. Vague.
 18 A I think so, yes.
 19 Q When was that?
 20 MR. CHUFF: Objection. Vague.
 21 A I think several years ago.
 22 Q What was the purpose of your review?
 23 A When I purchase it, I of course
 24 looked into the document. I have to know what I
 25 was purchasing. Once I took over the company, I

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18 (Pages 66 to 69)

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<p>1 HAN CHUNGUANG 2 gave them to Natasha. I also gave her the CO and 3 stuff so that she could handle stuff for me in 4 Hong Kong. 5 Q When you were serving as a director 6 of Eastern Profit, were there any other directors 7 besides yourself? 8 A When I was the director of the 9 company, no one else was. 10 Q When you were director of Eastern 11 Profit, was it successful? 12 A Was this successful company? How are 13 you going to define whether a company is 14 successful or not? Please teach me. 15 Q Were you pleased with the performance 16 of Eastern Profit when you were the director of 17 it? 18 MR. CHUFF: Objection. 19 Relevance. 20 A It was okay. 21 Q Did Eastern Profit have any debts 22 when you were a director? 23 MR. CHUFF: Objection. The 24 court already ruled on this. There's 25 to be no questioning about the</p>	<p>1 HAN CHUNGUANG 2 A What do you mean by that? 3 Q You've testified that Eastern 4 Profit's assets were frozen. How did you come to 5 know that? 6 A Natasha told me. 7 Q So the freezing, excuse me, of the 8 assets took place in the two years that Natasha 9 did services for Eastern Profit? 10 A I don't remember. It was a long time 11 ago. 12 Q After the assets of Eastern Profit 13 were frozen, was it able to conduct any business? 14 A Natasha could. Just one second. 15 THE INTERPRETER: Can you repeat 16 your question? I wanted to have your 17 question read back. I want to know 18 your question. 19 (The requested portion of the 20 record was read back by the 21 reporter.) 22 A After the asset was frozen, the 23 company didn't do any business. 24 Q What, as a director of Eastern 25 Profit, did you do to challenge the order freezing</p>
<p style="text-align: center;">Page 70</p>	<p style="text-align: center;">Page 72</p>

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<p>1 HAN CHUNGUANG 2 Profit? 3 A That's correct. I was an agent. 4 Q How long had it been since you were a 5 director of Eastern Profit when the freezing of 6 the assets happened? 7 MR. CHUFF: Objection to form. 8 A How long? Again, I don't remember 9 the specific, but I think about two years. 10 Q So two years passed after you left 11 being a director of Eastern Profit and when the 12 assets of the company were frozen? 13 MR. CHUFF: Objection to form. 14 A Can you repeat your question? 15 Q How much time passed after you 16 stopped being a director of Eastern Profit and 17 when the assets were frozen? 18 A I don't remember. 19 Q Who ordered the freezing of Eastern 20 Profit's assets? 21 MR. PODHASKIE: Objection. 22 Form. 23 A I didn't know who ordered it. I 24 really wanted to know the answer to your question. 25 I think it was an order from the communist party </p>	<p>1 HAN CHUNGUANG 2 company to find out the Chinese government's 3 corruptions. Number 2, to help me unfreeze my 4 assets. Number 3 to have my company back to 5 normal. 6 Q Did anyone replace Natasha after she 7 stopped doing work for Eastern Profit? 8 MR. CHUFF: Objection. Asked 9 and answered. Relevance. 10 A No. 11 MS. DONNELLI: We'll make this 12 the last couple of questions before 13 our break. 14 Q Prior to the time that Eastern 15 Profit's assets were frozen, did Eastern Profit 16 operate a private equity fund? 17 MR. CHUFF: Objection. This 18 goes to the independent financial 19 control and identity of Eastern 20 Profit, and the court has already 21 ruled this is not a permissible scope 22 of questioning. 23 MS. DONNELLI: Are you 24 instructing the witness not to 25 answer? </p>
<p style="text-align: center;">Page 74</p> <p>1 HAN CHUNGUANG 2 in China. 3 Q You don't know why the assets were 4 frozen or what reason was given? 5 MR. CHUFF: Objection. 6 Foundation. 7 A No, I don't. 8 Q You mentioned that transaction was 9 done by Eastern Profit with an investigation 10 company. 11 Do you remember your testimony? 12 THE INTERPRETER: Can I have the 13 question read back? 14 (The requested portion of the 15 record was read back by the 16 reporter.) 17 MR. PODHASKIE: Objection. 18 Form. 19 A Yes. 20 Q Was the purpose of the investigation 21 to allow Eastern Profit to have its assets 22 unfrozen? 23 A That was a part of it. 24 Q What was the other part? 25 A Number 1, to hire this investigation </p>	<p>1 HAN CHUNGUANG 2 MR. CHUFF: Yes. 3 Q When you were a director of Eastern 4 Profit, did it have any clients? 5 MR. CHUFF: Same objection. It 6 goes to independent financial 7 identity, and the court has already 8 ruled on this. 9 Q Which family trust did Eastern Profit 10 give the money with which it was making 11 investments? 12 MR. CHUFF: Same objection. 13 Q Did you receive compensation as a 14 director of Eastern Profit? 15 A When I was the director of the 16 company? 17 Q Yes. 18 MR. PODHASKIE: Objection. 19 Makes no sense. He's the owner, but 20 I will let him answer. 21 MS. DONNELLI: Please don't 22 testify for the witness, counsel. 23 A I think so. 24 Q What was it? 25 A Are you talking about the revenue in </p>

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20 (Pages 74 to 77)

Han Chunguang
November 11, 2019

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<p>1 HAN CHUNGUANG 2 my company? 3 Q Any kind of compensation. 4 MR. CHUFF: Objection. 5 Misleading. 6 A Since I don't feel that this question 7 has anything to do with this case, this is about 8 the finance of the company. I'm not going to 9 answer it. 10 Q Was the reason that you stopped being 11 a director of Eastern Profit because you weren't 12 being paid for your work? 13 MR. CHUFF: Objection. Vague. 14 Confusing and misleading. 15 A Again, this has nothing do with this 16 case. I'm not going to answer it. 17 Q Did you receive any compensation or 18 payments as an agent of Eastern Profit? 19 A I believe so. I believe when the 20 company's asset is unfreeze one day, I will 21 receive some compensation, because this is normal 22 business model where I believe I will receive some 23 compensation one day. 24 Q Before Eastern Profit's assets were 25 frozen, did you receive any compensation?</p>	<p>1 HAN CHUNGUANG 2 ask her for opinion. Just part of a business 3 routine. 4 Q Have you ever been a principal of 5 Eastern Profit? 6 MR. CHUFF: Objection. Asked 7 and answered. 8 A When are you talking about? 9 Q Any time since 2014 to the present. 10 MR. CHUFF: Same objection. 11 A I am always acting on behalf of 12 Eastern Profit. 13 Q Has he ever held the title principal 14 of Eastern Profit? Have you? 15 MR. CHUFF: Same objection. 16 A I don't really understand your 17 question. All I can say to you is that before I 18 transfer it, my company to her, I was the 19 director. After I transfer my company to her, I 20 was the agent. That is it. 21 Q Do you receive compensation from 22 Golden Spring, New York? 23 A No. 24 Q Have you ever? 25 A No.</p>
<p style="text-align: center;">Page 78</p>	<p style="text-align: center;">Page 80</p>

<p>1 HAN CHUNGUANG 2 MR. CHUFF: As an agent or a 3 director? 4 Q Either in your capacity as an agent 5 or a director? 6 MR. CHUFF: Objection. 7 Compound. And to the extent it's 8 asking for compensation as an owner 9 is misleading. 10 A When you say about compensation, can 11 you be more specific, because I really don't 12 understand the word compensation. 13 Q It means wages, salary, money for any 14 reason. 15 A When I was a director, when I was a 16 boss, of course I received some money. Because I 17 was making money or cost, I reaped the benefits. 18 Q At Eastern Profit is there a 19 difference between a principal and a director 20 role? 21 A Between principal and the director? 22 Q Yes. 23 A Right now Guo Mei is the director of 24 the company while I am her agent. When I'm 25 handling her stuff for her out of respect, I will</p>	<p>1 HAN CHUNGUANG 2 MS. DONNELLI: We'll take a 3 break. 4 (At this time, a brief recess 5 was taken.) 6 (Time noted: 12:54 p.m.) 7 (After a luncheon recess was 8 taken, the following was had:) 9 (Time noted: 1:48 p.m.) 10 A F T E R N O O N S E S S I O N 11 CONTINUED EXAMINATION 12 BY MS. DONNELLI: 13 Q We're here after a break. 14 Would you say that -- 15 MR. CHUFF: Could I just make 16 one thing on the record. 17 So we've been going for two and 18 a half hours now, and virtually none 19 of the questioning has been within 20 the scope of what the court ordered 21 Mr. Han to appear for. 22 If it continues, we reserve our 23 rights to seek fees from the court 24 after this deposition.</p>
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21 (Pages 78 to 81)

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<p>1 HAN CHUNGUANG 2 Q Would you say, Mr. Han, that you were 3 very careful in your role as a director of Eastern 4 Profit? 5 A What do you mean by that? 6 Q You wanted everything done right as a 7 director of Eastern Profit; correct? 8 A Yes. 9 Q You wouldn't have signed something 10 for Eastern Profit unless you were a director of 11 it; right? 12 MR. CHUFF: Objection. 13 Misleading. Mischaracterizes 14 testimony. 15 A I don't understand your question. 16 What do you mean by that? 17 Q You wouldn't have signed something 18 for Eastern Profit unless you were a director of 19 Eastern Profit; right? 20 MR. CHUFF: Same objection. 21 A When I was an agent for a company, I 22 had also signed some documents. 23 Q Is one of Eastern Profit's 24 investments cars? 25 MR. CHUFF: Objection. This is</p>	<p>1 HAN CHUNGUANG 2 A I don't think Eastern Profit had ever 3 invested in car. But the company owned cars. 4 Q How many cars did the company own 5 when Mr. Han was a director? 6 MR. CHUFF: Objection. This is 7 all irrelevant. 8 A Several. 9 Q Have you ever attended a director's 10 meeting for Eastern Profit? 11 MR. CHUFF: Objection. This 12 goes into the financial independence 13 of Eastern Profit, and the court 14 already ruled on this. You're not 15 permitted to ask questions about it. 16 Q You testified that you put a 17 signature on documents as an agent for Eastern 18 Profit. In connection with that, did you ever 19 attend any meeting giving you authority to do 20 that? 21 A What kind of meeting? 22 Q Any kind of meeting in which, 23 Mr. Han, you were given authority to make your 24 signature on behalf of Eastern Profit? 25 MR. CHUFF: Objection. Asked</p>
<p style="text-align: center;">Page 82</p> <p>1 HAN CHUNGUANG 2 beyond the scope of the court order 3 Mr. Han is here for. 4 MS. DONNELLI: Are you 5 instructing the witness not to answer 6 that? It comes directly from 7 Miss Wang's testimony for Eastern 8 Profit within the last couple of 9 weeks. 10 MR. CHUFF: It's beyond the 11 scope of what the court ordered for 12 Mr. Han. 13 MS. DONNELLI: So are you 14 instructing the witness not to 15 answer? 16 MR. CHUFF: You can ask your 17 question. 18 MS. DONNELLI: Okay. Can you 19 read it back? Thank you. 20 (The requested portion of the 21 record was read back by the 22 reporter.) 23 A What cars? 24 Q Any kind of investment in cars, 25 vehicles.</p>	<p>1 HAN CHUNGUANG 2 and answered. 3 A In New York I authorized Yvette to 4 handle the affairs for me here. 5 Q What kind of reporting did Yvette do 6 to you after you authorized her? 7 A Yvette -- 8 MR. CHUFF: Objection. Form. 9 A Not much reporting from her because I 10 trust her very much in the same position against 11 communist party in China. 12 I have full confidence in her to 13 handle the affair for me. There's not much 14 reporting required from her. Of course 15 occasionally we talked a little bit about it. 16 Q Did you authorize Yvette to handle 17 all the affairs of eastern profit or just the one 18 involving the investigative project? 19 A Everything. 20 Q For the everything, did you ever 21 authorize Yvette to approve an invoice for Eastern 22 Profit? 23 MR. CHUFF: Objection. Assuming 24 facts. 25 A When I'm talking about my</p>

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22 (Pages 82 to 85)

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1 HAN CHUNGUANG
 2 authorization to Yvette, I'm actually talking
 3 about everything related to the hired
 4 investigation company.
 5 Q I thought your testimony was that you
 6 authorized a Yvette to handle all of the affairs
 7 of Eastern Profit?
 8 A No. Thing related to this matter.
 9 Q What do you mean by "this matter"?
 10 A To hire this investigation company
 11 and also to handle everything related to the hired
 12 investigation company.
 13 Q Was there anything else that you
 14 authorized Yvette to handle for Eastern Profit?
 15 A Only for this investigation and
 16 everything related to it.
 17 Q Did you get permission from Guo Mei
 18 to authorize Yvette?
 19 MR. CHUFF: Objection. Asked
 20 and answered.
 21 A I did not have to have permission for
 22 Guo Mei. However, I did report it to her. I did
 23 speak to her about it.
 24 Q Were you the person who chose Yvette
 25 for her role versus someone else?

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1 HAN CHUNGUANG
 2 Q Was that because the assets of
 3 Eastern Profit were frozen?
 4 A Yes.
 5 Q What volume of assets of Eastern
 6 Profit were frozen?
 7 MR. CHUFF: Objection. Vague as
 8 to what volume means.
 9 A Are you asking me to give you a
 10 number or what?
 11 Q More of a category. Was it all of
 12 Eastern Profit's assets that were frozen, a
 13 portion of them, something less than all?
 14 A My company account or accounts was --
 15 all were freezed.
 16 THE INTERPRETER: Again in
 17 Chinese there's no singular or
 18 plural.
 19 Q In total or just in part?
 20 A All.
 21 Q You testified that the reason that
 22 Eastern Profit got involved with the investigative
 23 company was to unfreeze Eastern Profit's assets.
 24 Do you remember that testimony?
 25 MR. PODHASKIE: Objection.

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1 HAN CHUNGUANG
 2 A Yes.
 3 Q In connection with Yvette's work, did
 4 she have control over Eastern Profit's bank
 5 accounts?
 6 MR. CHUFF: Objection. It's
 7 beyond the scope of what the court
 8 allowed Mr. Han to testify about.
 9 A I don't want to answer this question.
 10 Q Are you instructing the witness not
 11 to answer the question? It relates specifically
 12 to the work that Yvette did in relation to Eastern
 13 Profit and the investigative project?
 14 MR. CHUFF: Can you explain that
 15 to me? I don't see how it does.
 16 MS. DONNELLI: In connection
 17 with that work I've asked did Yvette
 18 have control over Eastern Profit's
 19 bank accounts in connection with that
 20 work.
 21 MR. CHUFF: You didn't use that
 22 last phrase.
 23 Q In relation to the investigative
 24 project.
 25 A She couldn't.

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1 HAN CHUNGUANG
 2 Mischaracterizes the testimony.
 3 A Yes, I did.
 4 Q Was that project successful to
 5 unfreeze Eastern Profit's assets?
 6 A Up to now, no. It's not successful.
 7 Q Eastern Profit's assets remain frozen
 8 today; is that true?
 9 A Yes.
 10 Q Do you know how long that the
 11 investigative company was allowed to do its work?
 12 A When Yvette talked to me at the time,
 13 she said it would only take several months and we
 14 will see the result of it.
 15 Q When Eastern Profit didn't see the
 16 result of it, did it hire any other company to do
 17 the investigation?
 18 MR. CHUFF: Objection. Are you
 19 asking of the same targets, that's
 20 strategic vision?
 21 MS. DONNELLI: Counsel, please
 22 don't testify for the witness. You
 23 made an objection to form. Let us go
 24 on.
 25 MR. CHUFF: I'm just trying to

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23 (Pages 86 to 89)

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<p>1 HAN CHUNGUANG 2 help you. 3 MS. DONNELLI: I don't think 4 you're trying to help. 5 MR. CHUFF: I am because the 6 court said you're allowed to ask 7 about the subjects that were part of 8 the Strategic Vision contract and not 9 other subjects. 10 So if you want to ask about 11 those subjects, it's permissible. 12 Otherwise it's not. 13 Q Regarding any of the work that 14 Eastern Profit hired the investigative company to 15 do, once that unfreezing of assets didn't happen, 16 did Eastern Profit hire any other company for the 17 purpose of unfreezing the assets through 18 investigative work? 19 A This has nothing to do as it is. 20 Q Please answer the question. 21 A I don't want to answer. 22 MR. CHUFF: You can answer, if 23 you know. 24 A Are you asking if Eastern Profit 25 hires another investigative company to do the same</p>	<p>1 HAN CHUNGUANG 2 to enter into an arrangement with the 3 investigative company? 4 MR. PODHASKIE: Objection. 5 Beyond the scope of the court's 6 order. 7 A No. I give the full authorization to 8 Yvette. It was not necessary to require a 9 resolution. 10 Okay. Let me tell you why I give 11 Yvette full authorization over this matter. The 12 reason was that Miss Guo was against communist 13 party in China. I followed Mr. Guo's example. I 14 was also strongly against the communist party in 15 China wands that was why the Chinese government 16 freeze my asset. 17 And when Yvette told me about this 18 wonderful company that would be able to expose the 19 Chinese government's corruption and it will give 20 me an opportunity to get my asset back. She also 21 assured me that in U.S., this could be done 22 legally, and I thought that this was wonderful 23 idea. I get gave her my full authorization to 24 handle this matters. 25 Like Miss Guo, we were all against</p>
<p style="text-align: center;">Page 90</p>	<p style="text-align: center;">Page 92</p>

<p>1 HAN CHUNGUANG 2 job. 3 Q Yes. After the first investigative 4 company was no longer doing the project. 5 A I'm not sure. 6 Q Your testimony is that you're not 7 aware of any other company that came in after to 8 do the same work; true? 9 A Yes. 10 Q When Eastern Profit was entering into 11 the project with the investigation company, did 12 Eastern Profit pass a resolution to allow that 13 transaction? 14 A I authorized Yvette to take care of 15 this business, and Yvette had my full 16 authorization to take care of things like this. 17 Q Was a resolution signed by you 18 allowing Yvette to do this? 19 A I don't really understand what you 20 mean by resolution. 21 Q Do you know what the term resolution 22 means in the context of a private company? 23 A Yes, I do. 24 Q Did Eastern Profit's company bylaws 25 require a resolution before Yvette was permitted</p>	<p>1 HAN CHUNGUANG 2 the communist parties in China. I gave her my 3 full authorization to take charge of this matter. 4 Q What is located at the Tai Yau 5 building located at 181 Johnston Road, Wanchai, 6 W-A-N-C-H-A-I, Hong Kong, if you know? 7 MR. CHUFF: Objection. Beyond 8 the scope of the court's order. 9 A This has nothing to do with this 10 case. I am not at liberty to answer this 11 question. 12 Q How do you know that the Chinese 13 communist party was involved in the freezing of 14 Eastern Profit's assets? 15 A Can you repeat your question? 16 (Interpreter complying) 17 A Mr. Guo was in stanch option to 18 Chinese communist party. I followed his example, 19 and as a result of my position, my family was 20 persecuted by the Chinese communist party, and 21 then my accounts in Hong Kong were freezed, and my 22 workers were taken away by the police. 23 Who else -- did they have such kind 24 of power to take away my people without leaving a 25 trace. It was only the communist party in China.</p>
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24 (Pages 90 to 93)

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<p>1 HAN CHUNGUANG 2 Q You say that your workers were taken 3 away. Did they work for Eastern Profit? 4 MR. PODHASKIE: Objection. 5 Beyond the scope. 6 A Natasha. Natasha was taken away. 7 Q Is Natasha the workers, plural, that 8 you just described? 9 THE INTERPRETER: The 10 interpreter note the plurals should 11 be the mistake of interpreter, 12 because interpreter would not know 13 how many workers because Chinese 14 doesn't have singular or plural. 15 A Yes, Natasha. I was talking about 16 Natasha, my agent back then. 17 Q Did the interpreter use the name 18 Q-U-G-A-I-O -- G-U-O-J-I-A-O in relation to that 19 last answer? 20 A Interpreter only repeated what the 21 witness said. Now unfortunately interpreter has 22 no memory of what my reputation is. 23 Q Mr. Han, what did you do to qualify 24 as a dissident in the eyes of the Chinese 25 communist party?</p>	<p>1 HAN CHUNGUANG 2 testimony. 3 MR. CHUFF: This court has 4 already ruled that you can't ask 5 those questions. Is not tied to any 6 claim or defense in this action. 7 MS. DONNELLI: See the problem 8 is that the time the court entered 9 that order, the representation had 10 been made by your side of things that 11 Mr. Han didn't have knowledge. There 12 was no reason to have him as a 13 witness. He didn't have anything to 14 say. 15 We now know based on Miss Wang's 16 testimony a couple of weeks ago that 17 Mr. Han does have information and he, 18 in fact, has been describing that 19 information today. 20 MR. CHUFF: Why the assets got 21 seized has nothing to with the 22 contract and whether the contract was 23 performed, or whether someone lied 24 about whether Guo was a dissident. 25 It's irrelevant and it's beyond</p>
<p style="text-align: center;">Page 94</p>	<p style="text-align: center;">Page 95</p>

25 (Pages 94 to 97)

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<p>1 HAN CHUNGUANG 2 MR. CHUFF: What element of what 3 defense or claim does this relate to. 4 MS. DONNELLI: There are fraud 5 claims. 6 MR. CHUFF: I know that's what 7 you guys keep saying. But explain it 8 to me because I don't understand it, 9 and the court hasn't understood it. 10 THE INTERPRETER: It's getting 11 real long. 12 MS. DONNELLI: I'm sorry. I've 13 gotten a little lost. 14 You made an objection. I 15 responded. Are you instructing the 16 witness not to answer? 17 MR. CHUFF: Can you just repeat 18 the question for me one more time? 19 (The requested portion of the 20 record was read back by the 21 reporter.) 22 MR. CHUFF: The answer to 23 counsel's question is yes. 24 MS. DONNELLI: So the witness is 25 being instructed not to answer that</p>	<p>1 HAN CHUNGUANG 2 A I don't know the specific, but I 3 heard about this person before. 4 Q From. 5 MR. CHUFF: Note my objection. 6 Asked and answered. 7 A For Mr. Guo. Mr. Guo mentioned him 8 before. 9 Q In relation to Mr. Guo wanting to 10 find out information about this person. 11 A No. I didn't know why Mr. Guo 12 mentioned about this person. 13 Q This name, are you familiar with Sun, 14 S-U-N, the first name or the last name, and then 15 the first name is Lijun, L-I-J-U-N? 16 A Again, I heard those people before. 17 Q From Mr. Guo? 18 A Yes. 19 Q Did you understand that that 20 individual was one of the subjects that the 21 investigative company was going to research? 22 A Again, I don't know any specifics 23 about the project. 24 Q When you authorized Yvette to get 25 involved with the investigation project, did you</p>
<p style="text-align: center;">Page 98</p>	<p style="text-align: center;">Page 100</p>

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1 HAN CHUNGUANG
 2 Q When did you resign as a director?
 3 A On June 27, 2017 the company was
 4 transferred to Guo Mei, and Guo Mei asked me to
 5 continue to handle the company's affairs as an
 6 agent for her.
 7 MS. DONNELLI: Can you read the
 8 question, because the witness did not
 9 accept it.
 10 (The requested portion of the
 11 record was read back by the
 12 reporter.)
 13 A June 27, 2017.
 14 Q Why did you resign as a director of
 15 Eastern Profit?
 16 A This was one of my business' strategies which has nothing to do with this case. I'm not going to answer it.
 17 MS. DONNELLI: We'll need to ask the witness to answer the question.
 18 MR. CHUFF: Objection.
 19 Argumentative. Asked and answered.
 20 A I don't want to answer this question, and I insist that I not answer this question.
 21 Q Do you have the answer to the

1 HAN CHUNGUANG
 2 her. All this was not contradictory to each
 3 other.
 4 Q What do you mean by contradictory to
 5 each other?
 6 MR. CHUFF: Objection.
 7 A She asked me to be her agent, to take
 8 care of the affairs for her, and we were good
 9 friends. And I say okay. Fine. I will do so.
 10 I became an agent of the company.
 11 That was it.
 12 Q So Guo Mei asked you to resign from
 13 your directorship of Eastern Profit?
 14 MR. CHUFF: Objection. Assumes
 15 facts. Mischaracterizes testimony.
 16 A No.
 17 Q How did you come to know that Guo Mei
 18 had a plan that required you to resign as director
 19 from Eastern Profit?
 20 MR. CHUFF: Objection. Assumes
 21 facts. Mischaracterizes the
 22 testimony. Beyond the scope of what
 23 the court ordered him to testify to.
 24 A She told me she wanted to purchase my
 25 company to get into movie business. Then it's

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1 HAN CHUNGUANG
 2 question in your mind?
 3 A What answer?
 4 Q If the answer to the question is you
 5 don't know why you resigned from the company,
 6 that's one thing. But if the witness has the
 7 answer in his mind, he needs to give it in
 8 response to the question.
 9 MR. CHUFF: Objection. I
 10 disagree. It's clearly beyond the
 11 scope of what the court ordered.
 12 A I am not going to answer this
 13 question.
 14 Q Explain why you resigned as director
 15 of Eastern Profit that remained as you are
 16 testifying in a role allowing you to be involved
 17 with Eastern Profit?
 18 MR. CHUFF: Objection. Asked
 19 and answered.
 20 A This was a business strategy of mine.
 21 And when I transferred the company to Guo Mei, Guo
 22 Mei had some intention to how to use this company.
 23 She had her idea what she was going
 24 to do about it. And then she asked me to be an
 25 agent for this company to handle the affairs for

1 HAN CHUNGUANG
 2 long. Then she asked me to stay on to help her
 3 out as an agent.
 4 Q Wasn't it Mr. Guo's wish for his
 5 daughter to purchase Eastern Profit from you?
 6 MR. CHUFF: Objection. Beyond
 7 the scope.
 8 A I don't know.
 9 Q Did you resign from Eastern Profit
 10 because you needed someone to buy the stock from
 11 you, you were short on money?
 12 MR. CHUFF: Objection. This is
 13 way beyond the scope that the court
 14 allowed this witness to appear, and
 15 the topic then, the court allowed
 16 them to testify to.
 17 MS. DONNELLI: I'm about to hand
 18 the witness a document that was
 19 produced by Eastern Profit. I think
 20 it is relevant. Why else would it
 21 have been produced?
 22 MR. CHUFF: Whether he needs the
 23 money is in a document? I doubt it.
 24 MS. DONNELLI: We're marking
 25 this as Exhibit 30.

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27 (Pages 102 to 105)

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<p>1 HAN CHUNGUANG 2 (Defendant's Exhibit 30, Notice 3 of Change of Company Secretary and 4 Director (Appointment/Cessation) 5 Bates stamped EASTERN-000400 to 402 6 marked for Identification as of this 7 date.) 8 MS. DONNELLI: This is the first 9 exhibit we've used. 10 Q Mr. Han, if you turn to the third 11 page of the document. At the bottom of the 12 document do you see your name typewritten? 13 A Yes. 14 Q Is that the handwritten form of your 15 name above it? 16 A Yes. 17 Q Did you place your name on this 18 document? 19 A Yes. 20 Q Did you place your name on this 21 document on June 27, 2017? 22 A Yes. 23 Q The second page of the document, on 24 the box that is numbered 17, the second 17 at the 25 bottom --</p>	<p>1 HAN CHUNGUANG 2 take a break? 3 MR. CHUFF: If it's okay with 4 you, yes. 5 MS. DONNELLI: Let's take a 6 break at the witness' request for, 7 say, 10 minutes. 8 (At this time, a brief recess 9 was taken.) 10 CONTINUED EXAMINATION 11 BY MS. DONNELLI: 12 Q We're back on the record. 13 MR. CHUFF: We've gone another 14 hour and still haven't hit the topics 15 that the court Mr. Han to testify to. 16 We're reserving the right to seek 17 fees for this waste of time. 18 Q I'm going to hand you, Mr. Han, a 19 piece of paper. I have written three lines, and 20 I've asked for you to write your name, hand write 21 your name on those three lines. 22 I'm going to hand you a document that 23 we're going to mark. By the way, that is 24 Exhibit 31, this piece of paper. The three places 25 that the witness has written his name is 31.</p>
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<p>1 HAN CHUNGUANG 2 Q All right. The second page, is that 3 your handwritten name above the words Chunguang 4 Han? 5 A Yes. 6 Q Did you place your handwritten 7 signature there? 8 A Yes. 9 Q Was this on behalf of Eastern Profit? 10 A Yes. 11 Q What was the purpose of this 12 document? 13 A This was a Power of Attorney that I 14 gave Yvette the authority to handle the 15 investigation company's matter. 16 Q When did you sign this? 17 A Last year, 2018. 18 Q Who asked you to sign this on behalf 19 of Eastern Profit? 20 A I don't understand your question. 21 (The requested portion of the 22 record was read back by the 23 reporter.) 24 MR. CHUFF: Objection. Assumes 25 facts.</p>	<p>1 HAN CHUNGUANG 2 MR. PODHASKIE: Objection. 3 Asked and answered. 4 THE INTERPRETER: Interpreter 5 needs the witness to repeat one 6 portion of answer. 7 (Witness complying) 8 A Guo Mei gave me authorization to 9 agent, and then I gave the authorization to Yvette 10 to handle the matters. 11 Q Was Yvette an agent also? 12 A Yes. After I gave her the 13 authorization, she handled the matters, all the 14 matters on my behalf. 15 Q Were the authorizations done at the 16 same time? 17 MR. CHUFF: Objection. Asked 18 and answered. 19 A After June 27, 2017 when I 20 transferred my company to Guo Mei, Guo Mei 21 authorized me to be her agent. And then not long 22 after that, I authorized Yvette to handle the 23 matter for me. 24 Q Was the authorization from Guo Mei to 25 you put in writing?</p>
<p style="text-align: center;">Page 110</p> <p>1 HAN CHUNGUANG 2 A Yvette told me at the time we were 3 lied to, we were deceased, and we might have to 4 file a lawsuit against the other parties. 5 One day last year Yvette called me 6 saying that she had this document for me to sign 7 to authorize her to handle all these matters. I 8 said okay. And then I went to Yvette's, yes, 9 Yvette's office to sign this document. 10 Q Where was Yvette's office located? 11 MR. CHUFF: Objection. Asked 12 and answered. 13 A 800 Fifth Avenue. 14 Q So you did not prepare this document 15 yourself? 16 A No, I did not. 17 Q Why did Guo Mei not sign this 18 document? 19 A Because Guo Mei gave me the 20 authorization to handle the matters, and I gave 21 the authorization to Yvette to handle the matters. 22 And Yvette would report to me. 23 Q So we have two authorizations, one 24 from Guo Mei to you and one from you to Yvette; 25 correct?</p>	<p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection. Asked 3 and answered. 4 A No. Orally only. 5 Q Was your authorization to Yvette put 6 in writing? 7 A Here. 8 Q I'm sorry. It's Exhibit 32? 9 A Yes. 10 Q At the time that you signed 11 Exhibit 32, you were no longer a director of 12 Eastern Profit; correct? 13 MR. CHUFF: Objection. Asked 14 and answered. 15 A That's correct. 16 Q As a director of Eastern Profit, you 17 never allowed it to enter into a transaction 18 without signing a contract; correct? 19 A I don't understand your question. 20 Q When you were a director of Eastern 21 Profit, did it enter into any transaction without 22 signing a written document? 23 MR. CHUFF: Objection. Form. 24 A I don't understand your question. 25 What do you mean by transaction without contract.</p>

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<p>1 HAN CHUNGUANG 2 Q Mr. Han, you wouldn't enter into a 3 transaction for Eastern Profit without a contract; 4 true? 5 A In general, yes. 6 Q So why didn't you require Guo Mei to 7 put her authorization to you in writing? 8 MR. CHUFF: Objection. 9 Misleading. Irrelevant. 10 A No. It was not necessary. I had 11 known her for a long time. I built enough trust 12 to trust in her over this. 13 Q When Yvette asked you to sign 14 Exhibit 32, did you say: Wait a second. I can't 15 sign this. I'm no longer a director of Eastern 16 Profit? 17 MR. CHUFF: Objection. 18 Misleading. He's already testified a 19 number of times that he's an agent. 20 MS. DONNELLI: Please stop 21 testifying for the witness. 22 MR. CHUFF: Stop trying to 23 confuse the witness. 24 MS. DONNELLI: Please stop 25 testifying for the witness.</p>	<p>1 HAN CHUNGUANG 2 Misleading. Attempting to confuse 3 the witness. 4 A No. I signed the document because I 5 was an agent for Eastern Profit. 6 Q Explain to me why Guo Mei took your 7 role as director of Eastern Profit. Why did she 8 not coordinate directly with Yvette and leave you 9 out of this document 32? 10 A I don't know why she didn't do that. 11 However, I was an agent of the company. And over 12 this matter, Yvette and I initiated the project. 13 When the project became problematic, 14 of course I will continue to finish it off as an 15 agent of the company. 16 Q What is the difference, Mr. Han, 17 between an agent and a director of Eastern Profit? 18 MR. CHUFF: Objection. Calls 19 for a legal conclusion. 20 A The director is Guo Mei, and Guo Mei 21 tells me it's her agent. I can handle matters for 22 her on her behalf. 23 Q But you weren't handling matters for 24 her, you were delegating to Yvette; isn't that 25 true?</p>
<p style="text-align: center;">Page 114</p> <p>1 HAN CHUNGUANG 2 MR. CHUFF: He testified five 3 times now that he's an agent. 4 MS. DONNELLI: You're 5 discontinuing it on. 6 MR. CHUFF: I'm continuing it 7 on? 8 MS. DONNELLI: Yes. 9 MR. CHUFF: Someone is. 10 MS. DONNELLI: Testifying for 11 the witness is unacceptable, and 12 we'll bring that up later. 13 MR. CHUFF: Merely repeating the 14 answer that he's given times now. 15 A My attorney say I didn't have to 16 answer this question. 17 Q Not true. 18 MR. CHUFF: When she fixes the 19 question, you can answer it. 20 MS. DONNELLI: Will you please 21 read the question back. 22 (The requested portion of the 23 record was read back by the 24 reporter.) 25 MR. CHUFF: Objection.</p>	<p style="text-align: center;">Page 115</p> <p>1 HAN CHUNGUANG 2 MR. CHUFF: Objection. 3 Mischaracterizes the testimony. 4 Argumentative. 5 A That's correct. I ask Yvette to help 6 me because Yvette and I had the same goal, that we 7 were against Chinese communist parties. And when 8 Yvette told me there was this wonderful company 9 who could expose the Chinese government's 10 corruption, I felt this was a good opportunity, 11 because my company was freezed and my family were 12 persecuted. 13 I also was angry over this. And I 14 was interested in doing so. I asked Yvette to 15 help me out over this matter. 16 Q Isn't it true that Yvette had skills 17 that you didn't have and would, therefore, be a 18 benefit to Eastern Profit? 19 MR. CHUFF: Objection to form. 20 A What you have just said is not 21 completely right. It happened that Yvette at that 22 time had this wonderful source which was the 23 investigation company. And when she brought it up 24 to me, I thought this was a wonderful opportunity 25 to do so. That was why I asked her for her help.</p>

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<p>1 HAN CHUNGUANG 2 Q The help that you asked her for was 3 Exhibit 32; correct? 4 A Yes. And it started from the moment 5 she mentioned that she had found this 6 investigation company. I authorized her to deal 7 with the investigation company and all other 8 related issues. 9 (Defendant's Exhibit 33, a 10 document titled Substitution of 11 Counsel consisting of two pages 12 marked for Identification as of this 13 date.) 14 Q I'm going to hand you what we marked 15 as Exhibit 33. Is that your handwriting signature 16 above the typewritten words of your name? 17 A Can you tell me what this is? 18 Q Answer the question first, and then 19 I'm happy to. 20 A Before you tell me what this document 21 is, I cannot tell whether this is my signature. 22 Q Are you, Mr. Han, saying you cannot 23 recognize your signature, whether it appears on 24 this document? 25 MR. CHUFF: Objection.</p>	<p>1 HAN CHUNGUANG 2 that your signature? 3 MR. CHUFF: Objection. I would 4 ask the translator to read the title 5 of the document to the witness. 6 MS. DONNELLI: I would ask the 7 witness if this is the handwritten 8 form of his signature on the last 9 page of Exhibit 34. 10 MR. CHUFF: You're not providing 11 translated copies of the document. I 12 would ask the translator to read the 13 title. 14 MS. DONNELLI: I'm instructing 15 you not to. The witness can be asked 16 questions after I'm done. 17 At least for my question, 18 Exhibit 34, is that the handwritten 19 form of the witness' signature on the 20 last page? 21 MS. DONNELLI: Miss translator, 22 please just listen to my instruction 23 as the attorney taking the 24 deposition. 25 MR. CHUFF: You have to</p>
<p style="text-align: center;">Page 118</p> <p>1 HAN CHUNGUANG 2 Argumentative. This was an English 3 speaking witness. They would be able 4 to read the document. You should 5 tell them what they're looking at. 6 MS. DONNELLI: He can answer the 7 question. 8 A It doesn't look like my signature. 9 MR. CHUFF: Are you going to 10 tell him what you were looking at? 11 You said you would after he answered 12 the question. 13 MS. DONNELLI: We're moving on. 14 MR. CHUFF: Okay. 15 MS. DONNELLI: We're going to 16 look at what we have marked as 17 Exhibit 34. 18 (Defendant's Exhibit 34, a 19 document titled Research Agreement 20 dated December 29, 2017 Bates stamped 21 EASTERN-000005 to 000009 marked for 22 Identification as of this date.) 23 Q I would ask for you to turn to the 24 last page of this document. 25 On the bottom right-hand side, is</p>	<p style="text-align: center;">Page 120</p> <p>1 HAN CHUNGUANG 2 translate the objection too. That's 3 ridiculous. 4 THE INTERPRETER: The 5 interpreter has translated the 6 question three times per instruction 7 of the questioning witness. 8 MS. DONNELLI: Can you read the 9 most recent question that I've asked? 10 THE INTERPRETER: The signature? 11 MS. DONNELLI: We'll start it 12 like this. 13 Q The last page of Exhibit 34, is that 14 the handwritten form of your name? 15 MR. CHUFF: I instruct the 16 witness to ask what document it is 17 that he's looking at. 18 MS. DONNELLI: You can instruct 19 the witness, which is improper. The 20 witness can answer the question, and 21 you can ask your witness questions 22 after I'm done. 23 MR. CHUFF: You are being 24 completely unfair to the witness. He 25 cannot read what document.</p>

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<p>1 HAN CHUNGUANG 2 MS. DONNELLI: How do you know 3 what he can and can't do? That in 4 itself is an interesting question. 5 But the one that matters for now is 6 the last one I asked. 7 Can you repeat that to the 8 witness? 9 THE INTERPRETER: (Complying) 10 MR. CHUFF: I instruct the 11 witness not to answer it until 12 counsel tells him what he's looking 13 at. 14 MS. DONNELLI: The witness is 15 going to heed your instruction? 16 A Yes, I will listen to my attorney. 17 MS. DONNELLI: So that we have a 18 clear record, the witness on 19 instruction of his counsel is 20 refusing to answer the question 21 whether his signature appears in 22 handwritten form on the last page of 23 Exhibit 34. 24 MR. CHUFF: Because defendant's 25 counsel refuses to identify the</p>	<p>1 HAN CHUNGUANG 2 document? 3 MR. CHUFF: Objection. 4 Mischaracterizes the testimony. 5 A Since you show me an English 6 document, which I cannot read, and then you ask me 7 whether my signature is on it, I think it is 8 normal in nature for me to ask what this document 9 is before I answer your question. I have right to 10 know what this document, English document, is. 11 Q Is today the first day you've seen 12 Exhibit 34? 13 A Yes. 14 MS. DONNELLI: We may come back 15 to Exhibit 34 in a moment. For now I 16 will mark Exhibit 35. 17 (Defendant's Exhibit 35, a 18 document titled Loan Agreement Bates 19 stamped EASTERN-000278 to 280 marked 20 for Identification as of this date.) 21 Q If we turn to the last page of 22 Exhibit 35. 23 A Yes. I'm looking at it. 24 Q Thank you. Do you see two 25 handwritten signatures on the last page of</p>
<p style="text-align: center;">Page 122</p> <p>1 HAN CHUNGUANG 2 document for a non English-speaking 3 witness. 4 Q I'm going to hand you Exhibit 31, 5 Mr. Han. Do you need me to tell you what that 6 document is before you can recognize whether it's 7 the handwritten form of your signature? 8 A Can you ask the interpreter to tell 9 me what this document is. 10 Q Can you answer the question about 11 Exhibit 31, please? 12 A Yes. So what is your question 13 related to this document? 14 Q Do you need me to tell you what 15 Exhibit 31 is before you can tell me if that's the 16 handwritten form of your name? 17 A No, I don't. 18 MS. DONNELLI: I would like to 19 look back at Exhibit 34. So that I 20 have a clear understanding, is it the 21 witness' testimony that the witness 22 cannot identify whether it is the 23 handwritten form of his name on 24 Exhibit 34, last page, unless I tell 25 him what the title is of the</p>	<p>1 HAN CHUNGUANG 2 Exhibit 35? 3 A Yes. 4 Q Is one of them the handwritten form 5 of your name? 6 MR. CHUFF: Same objection. 7 A The one above is. 8 Q Is that signature to the right of the 9 typewritten form of your name? 10 A Yes. 11 Q Did you place your signature on this 12 Exhibit 35? 13 MR. CHUFF: Objection. How can 14 he answer the question without 15 knowing what it is? 16 Q Have you ever seen Exhibit 35 until 17 today? 18 MR. CHUFF: Same objection. 19 A Can I ask my interpreter what the 20 title of this document is? 21 Q No. Please answer the question 22 whether or not you have seen this two and a half 23 page document labeled Exhibit 35 before today. 24 MR. CHUFF: Same objection. 25 A Based upon my recollection, this was</p>

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<p>1 HAN CHUNGUANG 2 the loan agreement between William and I. 3 Q Did Mr. Han, you place your signature 4 and handwriting on page 3 of this Exhibit 35. 5 A Yes. 6 Q When did you do that? 7 A In 2018. No. I think at end of 8 2017. 9 Q Which is your answer? 10 MR. CHUFF: Objection. 11 A What? 12 Q Which is your answer? 13 MR. PODHASKIE: Only if you 14 know. Don't speculate. 15 A The end of 2017. 16 Q You said that William G's signature 17 is below yours? 18 MR. CHUFF: Objection. 19 Mischaracterizes the testimony. 20 A I don't understand your question. 21 Q Does the signature of William G. 22 appear below your signature on Exhibit 35, page 3? 23 A My signature is above his. 24 Q When you placed your signature on 25 Exhibit 35, was Mr. G's signature already there or</p>	<p>1 HAN CHUNGUANG 2 A In business meetings in Hong Kong I 3 met William, as a result of which we became good 4 friends. 5 Q Was the meeting in Hong Kong about 6 Eastern Profit business? 7 A No. 8 Q Who does Mr. G work for? 9 MR. CHUFF: Objection. The 10 court already ruled that you cannot 11 ask about ACA's financial 12 information. 13 MS. DONNELLI: Counsel, I think 14 you just hinted something to the 15 witness that was improper. So why 16 don't you just object to form. 17 MR. WHO: 18 MR. PODHASKIE: This whole thing 19 is improper. 20 MR. CHUFF: No. I'm instructing 21 him not to answer because it's beyond 22 the scope of what the court ordered. 23 MS. DONNELLI: Then that is 24 probably better than instructing the 25 witness how to answer.</p>
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<p>1 HAN CHUNGUANG 2 personally or something else? 3 A On behalf of Eastern Profit. 4 Q We see from the first page of 5 Exhibit 35 that it's dated December 29, 2017. 6 Do you see that on the first line? 7 MR. CHUFF: Objection. 8 A Yes. 9 Q By December, 2017, you hadn't been a 10 director of Eastern Profit for several months; 11 correct? 12 A Yes, that's correct. 13 Q So why did you believe you were in a 14 position to ask to borrow money for Eastern Profit 15 at that time? 16 MR. CHUFF: Objection. Asked 17 and answered. 18 MS. DONNELLI: Counsel, we 19 haven't even gotten into this 20 document. How it could be asked and 21 answered, I believe it couldn't have 22 been. 23 MR. CHUFF: He testified to 24 his -- 25 MS. DONNELLI: Please stop </p>	<p>1 HAN CHUNGUANG 2 the payment was going to come from the company 3 itself since the asset was freezed. I instead 4 borrowed money from him. 5 Q I thought you testified that Natasha 6 stopped working for Eastern Profit in 2016, two 7 years after you became director. 8 MR. CHUFF: Objection. 9 Mischaracterizes the testimony. 10 A Who are you talking about? 11 Q The person who the witness, Mr. Han, 12 talked about. Mr. Han, I believe you testified 13 that Natasha worked for Eastern Profit for two 14 years. 15 Did I remember that correctly? 16 A I think you misunderstood my answer. 17 Previously when I say that she had worked for the 18 company for two years, I thought I was trying to 19 tell you she worked for a company during the two 20 years I was the director. 21 But after that, she still helped out 22 with the company's affairs. 23 Q Mr. Han, weren't you a director of 24 Eastern Profit for three years, not two? 25 A I don't remember exactly how long. </p>
<p style="text-align: center;">Page 130</p> <p>1 HAN CHUNGUANG 2 testifying for the witness. 3 MR. CHUFF: You're trying to 4 confuse the witness. He testified to 5 his authority earlier. That's all I 6 will say. 7 MS. DONNELLI: Oh, because 8 you've answered the question for him, 9 so you can just stop; is that it? 10 Please stop instructing this witness 11 how to answer. 12 MR. CHUFF: You need to stop 13 trying to confusion the witness. 14 MS. DONNELLI: Can you read the 15 question back, please. 16 (The requested portion of the 17 record was read back by the 18 reporter.) 19 A Yes. As I have previously testified 20 numerous times, Guo Mei authorized me as her agent 21 to handle matters on behalf of Eastern Profit. 22 Q How did you know that Eastern Profit 23 needed to borrow money as this Exhibit 35 shows? 24 A Because Natasha at the time told me 25 the company assets were frozen. And at the time </p>	<p>1 HAN CHUNGUANG 2 It was more than two years. 3 Q I thought you also testified, 4 Mr. Han, that Natasha was a person who was taken 5 by the Chinese communist party? 6 A Yes. 7 Q So how was Natasha able to inform you 8 in December of 2017 that Eastern Profit needed to 9 borrow money? 10 A I don't think she was taken away in 11 2017. I think she was taken by the police last 12 year in 2018. 13 Q How many times did you meet with 14 Mr. G in person about this loan agreement? 15 A I think two or three times. 16 Q Was that before or after the meeting 17 in the hotel lobby? 18 A I think before. 19 Q Mr. G brought this loan agreement 20 with him to meet you in the hotel lobby; correct? 21 A Before this, we talked about a loan 22 over the phone, and then William drafted the 23 document. At the end, he brought it to the hotel 24 lobby, to which both of us signed. 25 Q You were the one then who negotiated </p>

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<p>1 HAN CHUNGUANG 2 the terms of the loan on behalf of Eastern Profit; 3 correct? 4 MR. CHUFF: Objection. 5 Mischaracterizes the testimony. 6 A Yes. William and I talked over the 7 phone about the interest payment of 2 percent and 8 about a half year and stuff like that. 9 Q How about the amount of the loan, did 10 you negotiate that? 11 A A million dollars. 12 THE INTERPRETER: Interpreter 13 need to clear it with the witness. 14 A Yes, U.S.D. 15 Q When Mr. G handed you this document, 16 did you say to him wait, I can't sign this because 17 I'm no longer a director of Eastern Profit? 18 MR. CHUFF: Objection. 19 Misleading. 20 A No, I did not. 21 Q Did you keep a copy of this loan 22 agreement after you signed it that day in the 23 hotel lobby with Mr. G? 24 A No. 25 Q Why not?</p>	<p>1 HAN CHUNGUANG 2 would tell the fiscal department about this loan. 3 Q The fiscal department at Eastern 4 Profit or somewhere else? 5 A Of course Eastern Profit. 6 Q Did you explore what the terms would 7 be for Eastern Profit if it borrowed the money 8 from someone other than Mr. G? 9 A No. 10 Q Why not? 11 A There was no reason why. Besides, if 12 you look at these tons, they were acquired no more 13 in terms of Hong Kong needs market. As a matter 14 of fact, if you compare the terms to other loans, 15 they were quite reasonable. 16 Q But Mr. Han, did you compare the 17 terms of any other possible loan before signing 18 this document? 19 A No. 20 Q Is it your testimony that you and 21 Mr. G placed your respective signatures on this 22 document on December 29, 2017? 23 MR. CHUFF: Objection. Asked 24 and answered. 25 A Yes.</p>
<p style="text-align: center;">Page 134</p> <p>1 HAN CHUNGUANG 2 A There was no reason why. 3 Q Mr. Han, you signed this document on 4 behalf of Eastern Profit; correct? 5 A Yes. 6 Q Was any other representative of 7 Eastern Profit with you at the meeting in the 8 hotel lobby where you signed this loan agreement? 9 A No. 10 Q Did you have any certainty that 11 Eastern Profit, for which you've testified you 12 were an agent, was going to even get a copy of 13 this loan agreement if you didn't leave that 14 meeting with a copy of it? 15 MR. CHUFF: Objection to form. 16 A After the assets of Eastern Profit 17 was freezed, this was the only one loan I made was 18 such a huge amount. Of course I remembered. Once 19 the asset is un-freezed, I would tell the fiscal 20 about it. He had money, the one handle the money. 21 Q What does the term fiscal mean in 22 relation to Eastern Profit? 23 A What I mean is that the time I 24 borrowed this money on behalf of the company, of 25 course eventually the loan has to be paid. And I</p>	<p>1 HAN CHUNGUANG 2 Q When you met with Mr. G to sign this 3 loan agreement, did you have anything to eat or 4 drink with him? 5 A No. 6 MR. CHUFF: Counsel, whenever 7 you get to a natural spot, can we 8 take a 5 or 10-minute break. 9 MS. DONNELLI: Okay. 10 MR. CHUFF: It doesn't have to 11 be right now. Just whenever you get 12 there. 13 MS. DONNELLI: Thank you. 14 Q What is the status of this loan as we 15 sit here today? 16 A The money is still owed. 17 Q Has Eastern Profit made any payment 18 on this loan? 19 A No, because the asset continues being 20 freezed. 21 MS. DONNELLI: The witness' 22 counsel has asked for break. We'll 23 take a short 10-minute break. 24 (At this time, a brief recess 25 was taken.)</p>

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Han Chunguang
November 11, 2019

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<p>1 HAN CHUNGUANG 2 CONTINUED EXAMINATION 3 BY MS. DONNELLI: 4 Q We are back after a short break. 5 Mr. Han, I would ask you to look at 6 Exhibit 34. This is a document entitled Research 7 Agreement. 8 Would you agree that this is the 9 research agreement for the investigative project 10 that you testified about today? 11 MR. CHUFF: Objection. 12 MR. PODHASKIE: Objection. 13 Foundation. 14 A I have never seen this document 15 before. 16 Q Could you turn to the last page of 17 the document. Is that the handwritten form of 18 your name on the last page at the bottom? 19 A Can the interpreter tell me again 20 what this is. 21 Q The name of the document, sure. 22 THE INTERPRETER: (Interpreter 23 complying) 24 A This is not my signature. 25 Q But does it reflect your name?</p>	<p>1 HAN CHUNGUANG 2 A Yes. 3 Q Then why don't you just work out the 4 Eastern Profit loan with Mr. G rather than having 5 Yvette do that job as you asked her to do in the 6 lobby of her building? 7 MR. CHUFF: Objection. 8 Mischaracterizes testimony. 9 A I don't understand your question. 10 Which lobby of the building, and what did I tell 11 Yvette? 12 Q Has Mr. G attempted to collect the 13 loan back from Eastern Profit? 14 A Yes. 15 Q How has he done that? 16 A He called and he said so in 17 face-to-face meeting. 18 Q Was Yvette at that meeting? 19 A No. 20 Q What did Mr. G say to you? 21 A William called me over the phone and 22 said that it was time to pay back the loan, 23 including accrued interest. 24 Q What did you do with that 25 information?</p>
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<p>1 HAN CHUNGUANG 2 A Where? 3 Q On the last page of the document. 4 MR. CHUFF: Can I direct him? 5 A Can you point it out to me? 6 Q I don't need to point it out. If the 7 witness does not recognize the handwritten form of 8 his name, then that's the answer that I'll take. 9 A This was not my signature. This is 10 not my signature. I did not see my name. I don't 11 see my name on it. 12 Q Now Mr. Han, you testified that you 13 were good friends with William G. Did I recall 14 that correctly? 15 A Yes. 16 Q You have had positive interactions 17 with Mr. G over the years? 18 A Yes. 19 Q You met Mr. G in Hong Kong on 20 business at least one time. 21 A I would say more like business 22 activities or events. 23 Q But you've been able to have a good 24 interaction with Mr. G in those events; true? 25 MR. CHUFF: Objection. Form.</p>	<p>1 HAN CHUNGUANG 2 A When he told me that, I say to him we 3 got into some trouble. We encountered some liars. 4 People were trying to scam us. I definitely tell 5 him that we needed more time to pay back the loan. 6 Q Was Eastern Profit a client of ACA? 7 A I don't think you can say that. 8 Q Meaning that it's not true? 9 MR. CHUFF: Objection. Beyond 10 the scope. 11 A Let me put it this way. What you 12 have just said can be true. The fact is that I 13 borrowed the money from William. As far as what 14 company William took the money out to lend me, it 15 was his business. 16 Q Does William -- 17 A He could be getting the money from 18 ACA or somewhere else, that I had no control over, 19 but the fact was that I borrowed the money from 20 William. 21 Q So in your mind, Eastern Profit was 22 borrowing \$1 million from William G? 23 MR. CHUFF: Objection. Form. 24 A I borrowed money from him. Of course 25 he issued the money to me from one of his</p>
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<p>1 HAN CHUNGUANG 2 Yvette told you that you needed to get money and 3 when you actually got the money from William G? 4 A Several days. 5 Q Was it less than a month? 6 MR. CHUFF: Objection. Asked 7 and answered. 8 A Again, I don't remember, but I think 9 it was a month, several days later. 10 Q What collateral did Eastern Profit 11 give for the loan? 12 MR. PODHASKIE: Objection. 13 MR. CHUFF: Objection. Assumes 14 facts. 15 A When you say collateral, what do you 16 mean? 17 Q Security for the repayment of the 18 loan. 19 A Number 1, the guarantee was that when 20 the assets company was un-freezed as a result of 21 the investigation, I will return him the money and 22 pay him back the loan. 23 Secondly, we were good friends. We 24 had enough trust. 25 Q If you had enough trust, why isn't </p>	<p>1 HAN CHUNGUANG 2 A No. 3 Q Do you know who Lianchao Han is? 4 L-I-A-N-C-H-A-O H-A-N. 5 A Can you just repeat it again. 6 Q Lianchao Han. 7 A The way you read it, I don't think 8 so. You're not telling me. I don't know this 9 person the way you read it. The way you spell it, 10 L-I-A-N-C-H-A-O. Lianchao, I don't know this 11 person. 12 Q Do you know someone with a name 13 similar to that? 14 MR. CHUFF: Objection to form. 15 A Again, I don't have any impression of 16 this name. 17 Q This morning I introduced you to 18 French Wallop who is sitting to my left. 19 A Mm-hmm. 20 Q Have you ever seen Miss Wallop before 21 today? 22 A No. I don't have a memory of it. 23 Q Did you ever prepare a meal for 24 Miss Wallop and in Mr. Guo's apartment? 25 MR. PODHASKIE: Objection. I </p>
<p style="text-align: center;">Page 146</p> <p>1 HAN CHUNGUANG 2 Yvette dealing with William G now instead of you? 3 MR. CHUFF: Objection. Form. 4 A There was no why. I give Yvette the 5 full authority to take care of this matter, and 6 she took care of this matter for me. That was it. 7 Q Do you know the individual name Je 8 Kin Ming? J-E K-I-N M-I-N-G. 9 A No. 10 Q Do you ever exchange E-mails with 11 William G? 12 A No. 13 Q You've never received an E-mail from 14 William G? 15 A No. 16 Q Have you ever met Karen Maistrello? 17 MR. CHUFF: Objection to form. 18 A I don't have impression of her. 19 Q You've never met Karen Maistrello? 20 MR. CHUFF: Objection. 21 Mischaracterizes the testimony. 22 A When you just bring this name up, I 23 don't have any impression of it. 24 Q What about if the first name is 25 Karen? </p>	<p>1 HAN CHUNGUANG 2 don't understand scope. 3 A Why would I prepare a meal for her, 4 especially I am not even a chef. 5 Q So it's a yes or no question. Please 6 answer it. 7 A No. 8 MR. CHUFF: Objection. 9 Q I introduced you this morning to 10 Mr. Michael Waller, who is sitting to the left of 11 me. 12 Mr. Waller, have you ever seen 13 Mr. Waller before today? 14 A Again, I don't have any impression of 15 him. 16 Q Were you present when the terms of 17 the investigation contract between Eastern Profit 18 and the investigation company were negotiated? 19 MR. PODHASKIE: Objection. 20 Asked and answered. 21 A No. 22 Q Did you have any role in the 23 negotiation of the contract between Eastern Profit 24 and the investigative company? 25 MR. CHUFF: Same objection. </p>

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1
2 A C K N O W L E D G M E N T
3
4 STATE OF NEW YORK)
5 ss:
6 COUNTY OF _____)
7
8 I, Han Chunguang, hereby certify that I
9 have read the transcript of my testimony taken
10 under oath in my deposition of November 11, 2019;
11 that the transcript is a true and complete record
12 of my testimony, and that the answers on the
13 record as given by me are true and correct.
14
15
16
17 _____
18 HAN CHUNGUANG
19
20 Subscribed and sworn to before me
21 This day of 2019
22
23 _____
24 (NOTARY PUBLIC)
25

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2
3 C E R T I F I C A T E
4
5 I, Terri Fudens, a stenotype reporter
6 and Notary Public within and for the State of New
7 York, do hereby certify:

8 That the witness whose testimony is
9 hereinbefore set forth was duly sworn by me and
10 that such testimony is a true record of the
11 testimony given by such witness.

12 I further certify that I am not related
13 to any of the parties by blood or marriage, and
14 that I am in no way interested in the outcome of
15 this matter.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand.
18 Signature Requested

19
20
21 _____
22 Terri Fudens
23
24
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41 (Pages 158 to 159)

Han Chunguang
November 11, 2019